

PUBLIC CONSULTATION ON THE EU GENERALISED SYSTEM OF PREFERENCES (GSP)

Listing of answers received

The Commission received 143 exploitable answers from a variety of stakeholders:

Citizens	9
Business Associations	51
Companies	34
No profit organisations	24
Others	25

Almost half the respondents were from within the EU (71), and half from outside the EU (72).

32 in Belgium/Brussels
11 Argentina
10 in Malaysia and Germany
9 in United Kingdom
8 in Bolivia
5 in Spain
4 each in Myanmar, India, and Paraguay
3 each in Uruguay, Ecuador, Finland, Qatar, Philippines, Sweden, France and Italy
2 each in Austria, Cambodia, Brazil and Colombia
1 each in Thailand, Vietnam, Portugal, Syria, Panamá, Lithuania, Bangladesh, Switzerland, former Yugoslav Republic of Macedonia, Mauritius, Uganda and St.Vincent and Grenadines.

NB Respondents were not required to answer to all questions. Therefore, in some cases there are less than 143 answers.

ANSWERS

Q1: Do you consider that the GSP is a valid trade instrument for development and should be continued?

a business association

Argentina

Argentine Oil Industry Chamber

Yes, it is a valid trade instrument in order to improve market access for developing and less developed countries, though it is not the most advantageous because of its deadline. The GSP has been useful to help many sectors of domestic industry in developing countries. EU's duty free or reduced import tariffs helps beneficiary countries to increase rural development, boost other economic areas and enhance investment in technology processes of industrialization.

a business association

Argentina

Argentine Biofuels Chamber

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a business association

Argentina

Rosario Board of Trade

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a business association

Argentina

Buenos Aires Grain Exchange

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a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

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a business association

Argentina

Bahia Blanca Grain Exchange

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a no profit organisation

Argentina

Industry chamber that represents argentine shoe-manufactures - Argentine Footwear Industry Chamber CIC

We believe that the GSP is a very important instrument for developing countries, considering the big differences between the different industries. Because of that, we consider that GSP is a valid trade instrument for development.

a no profit organisation

Argentina

Export services

Yes, it is a valid trade instrument in order to improve market access for developing countries. The GSP has been useful to help many sectors of domestic industry in developing countries. EU's duty free or reduced import tariffs helps beneficiary countries to increase rural development, boost other economic areas and enhance investment in technology processes of industrialization.

a no profit organisation

Argentina

Research on international Negotiations

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other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Entendemos que existe una estrecha relación entre comercio y desarrollo, razón por la cual, desde el momento en que el SGP es un instrumento diseñado para aumentar los ingresos de exportación de los PED, consideramos que la respuesta a la consulta es positiva: el SGP es un instrumento válido para el desarrollo. No obstante ello entendemos conveniente y oportuno introducir algunas modificaciones a fin de asegurar el cumplimiento de los objetivos que dieron origen a dicho sistema.

a business association

Argentine

Argentine Soybean Chain Association

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a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Das APS ist ein notwendiges und allgemein akzeptiertes Instrument zur Bekämpfung von Armut in EL durch Stärkung des Handels. Diese Ziele sollten in der kommenden Regelung bekräftigt werden, gleichzeitig sollte aber klar sein, dass das APS nicht das alleinige bzw Hauptinstrument zur Förderung der Entwicklung für LDCs ist. Eine Fortführung des APS steht genauso außer Zweifel wie die Notwendigkeit von vermehrten direkten und vor allem gezielten Fördermaßnahmen im Rahmen der allgemeinen Entwicklungshilfe.

a no profit organisation

Austria

trade policy

As Developing Countries are most hit by the global economic crisis, this instrument gained even more value for them. It is the only instrument that entails the precondition to ratify and implement the ILO-Core Labour Standards, which is in the interest of workforce in those countries. The respect for core labour standards, can enable developing countries to capture their fair share of the gains from international trade, and critically, to ensure that those gains are equitably shared. As G20 nations recognise, respect for core labour standards, along with the other pillars of the ILO's Decent Work Agenda, are central to promoting global sustainable and equitable economic recovery.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

YES. I FEEL THIS IS A TOOL HELPING MANY INDUSTRIES IN THE DEVELOPING COUNTRIES. EMPLOYMENT AND CAPACITY BUILDING HAPPENS WITH SUCH SUPPORT

a business association

Belgium

Cocoa sector

Applying GSP tariff preferences beneficiary countries have easier market access to the EU through the reduction in MFN duties. This can be an important source of development for these countries.

a business association

Belgium

International trade in flowers

Union Fleurs (the International Association of the Trade in Cut Flowers and Plants) strongly sees the GSP as a valid instrument for development in GSP beneficiary countries. The scheme has a

considerable impact on the international trade flows in flowers and plants and, consequently, on the economies of flowers and plants' net exporting countries, many of them being developing countries. Indeed, many Latin American countries (e.g. Colombia, Ecuador, Guatemala and Costa Rica) as well as East African countries (e.g. Kenya, Ethiopia) have heavily invested in floricultural production in order to diversify their export capacity. Trade preferences contribute substantially to their export revenues, to the EU in particular, and to economic growth in general. The Special Incentive Arrangement (GSP+), in particular, represents an essential mechanism to secure a competitive and sustainable development of the floricultural sector in Latin American countries and ensure the continuity of long-term local and foreign investments. The floricultural sector in these countries also creates many jobs, especially in rural areas and for women. In Colombia, for example, the floricultural sector today supports 220 000 direct and indirect jobs (60 percent of which is represented by women workforce). This has encouraged the floricultural industry to create several social programs for the workers and their families (including housing, nursing, day care, subsidised schooling, and subsidised food and nutrition programs) which have clearly contributed to setting a model for the private sector throughout the Latin American region.

a business association

Belgium

Renewable energies

Thanks to the GSP, GSP beneficiaries do not pay the EU customs duty (6.5% ad valorem), which amounts to a price advantage of around 50 euros per ton. As a comparison, the profitability margin set by Argentina authorities for setting the price of biodiesel on their internal market is 28 euros / ton. This means that GSP beneficiaries have a price advantage nearly double their profitability margin. EBB believes that biodiesel production can foster significant opportunities in developing countries in real need of industrial development, in particular countries with tropical climates where it is possible to produce biomass with high yields for biodiesel, including oil palm and jatropha. Emerging biodiesel exporting countries, mainly Central American and West African countries, are beneficiaries of the GSP+ or Everything But Arms and these two types of trade preferences should be maintained.

a business association

BELGIUM

NITROGEN FERTILIZERS

Yes but only for truly least developed countries and not for advanced economies with established high incomes or established investments with comparable technology to EU industry. Fairly traded imports from least developed countries benefitting from GSP advantages can be mutual beneficial

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

Yes. However, GSP should: (1) be consistent with other trade policy objectives First, the GSP undermines the EU's negotiating position in bilateral and especially multilateral trade negotiations because partners already have preferential access to the EU market or they are concerned about preference erosion. Second, five out of the ten largest GSP users are also negotiating Free Trade Agreements (FTAs) with the EU, which suggests that reciprocal FTAs are perceived to be more viable development tools than unilateral preferences. Also, Finally, the GSP does not address the abuse of trade restrictive measures by some GSP beneficiaries, for example raw materials restrictions. (2) be focused on the countries that need the preferences most. The EU's GSP scheme does not accurately reflect the varying, and changing, trade and developmental needs of partner countries. It primarily benefits increasingly competitive emerging economies instead of the poorer developing countries with limited participation in the international trading system.

a business association

Belgium

representation of interests of the EU food and drink industry

CIAA shares the view that the Generalised System of Preferences (GSP) is an essential instrument to generate revenue through trade in developing countries and to promote economic development. Its predictability, simplicity and objectiveness are crucial to this aim.

a business association

Belgium

International trade

FRUCOM (the European Federation of the Trade in Dried Fruit, Edible Nuts, Processed Fruit & Vegetables, Processed Fishery Products, Spices, Honey and Similar Foodstuffs) believes that the GSP scheme contributes considerably to the development in GSP beneficiary countries making their export capacity and performance more sustainable, competitive, and diversified. This is also one of reasons why it is crucial to ensure an easy-to-apply system that provides foreign countries' exporters and European importers with simple rules, legal certainty and stability over the years.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

Yes, GPS is a valid instrument but we have reasons to believe that it does not serve the basic purpose and that the countries which need it the most do not benefit from it to the extent they need.

a business association

Belgium

Wood products

It is a political instrument, which definitely facilitates trade flows. But these political instruments usually don't take into account the challenges the domestic industry is facing.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

FESI firmly believes that the GSP contributes to the competitiveness of products from developing countries and has a positive effect on third country economic development, employment, sustainable development and general wealth creation. It is thus an important policy instrument that should be continued. However the GSP can be improved in several ways and FESI welcomes the opportunity to contribute to this constructive debate.

a business association

Belgium

Trade association: Man-made fibres

The GSP is valid and should be maintained

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

Yes, it is. However, GSP should be designed and operated in a way that ensures consistency with other trade policy objectives and, as relevant, other EU policies. It is not acceptable that GSP rewards trade distorting practices and/or contradicts EU trade policy actions taken at other levels or in other domains of external policy.

a business association

Belgium

Textiles & Clothing

GSP is an instrument aimed at helping developing countries fighting against poverty by fostering trade and promoting sustainable development and good governance. These objectives should be maintained and reinforced in the upcoming GSP revision.

a business association

Belgium

To defend the interests of the EU aluminium transformers and consumers in the domains of EU policy of relevance for the sector
Yes, but in harmony with the general EU policies.

a business association

Belgium

EUROCHAMBRES, the Brussels-based Association of European Chambers of Commerce and Industry EUROCHAMBRES is the sole European body that serves the interests of every sector and every size of European business and the only one so close to business. EUROCHAMBRES has member organizations in 45 countries representing a network of 1,700 regional and local Chambers with over 19.8 million member companies. Chamber members employ over 120 million employees.

Yes. However, we believe that the GSP would be a more efficient tool for development if rules of origin were less complicated and more transparent. Moreover since the EU excludes or reduces the preferences for "sensitive products" the system is slow to adjust to the market needs of developing countries. These exclusions should be up for re-evaluation on a continuous basis. To be efficient, especially the EBA has to be paired with technical assistance to developing countries, building capacity to take part in global trade and benefit from the GSP.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

Yes, the GSP is a very important tool for development. For many importers, the less developed country Bangladesh is the second most important textiles supplier after China. Without the GSP and the advantage to import textiles free of duty, a number of companies would feel attracted to place more orders in China rather than in LDCs, due to missing advantages in price calculation. All the more, there is a need for a well-functioning system for increased trade that is part of the Millennium Development Goals/Agenda, and that by facilitating not only for exporters operating in the Internal Market but also for traders, retailers, wholesalers and importers. The results that can be expected from this include also an increase in economic growth and, hopefully, an increase in job opportunities for EU citizens as well.

a business association

Belgium

Representing the foreign trade interests of European retail trade

The role of the GSP should not be overestimated. Nevertheless, it should be continued as an instrument for development.

a citizen

Belgium

Finance

Yes

a company

Belgium

Import of food items

It could be continued but then only for those countries of origin which really and on a proven basis, have a high degree of local/domestic poverty. It should not be continued if the aim is just to make imports out of these poor(er) countries cheaper for the richer EU just for allowing us, as EU, to have access to artificially cheap products

a no profit organisation

Belgium

Development NGO

Yes

a no profit organisation

Belgium

Agricultural and Agrifood Trade

No comment

a no profit organisation
Belgium
Economic justice

GSP is a valid system and should be continued but in order to be valid and worthy of being continued the development logic of the system needs to be preserved and must not be overtaken by the commercial interests of European business.

a no profit organisation
Belgium
trade union

The EU's GSP system is an important instrument of EU trade policy in assisting developing countries to gain more revenue and growth from trade, and through its incentive structures, to link this with the promotion of sustainable development and good governance. Trade unions have long argued that the GSP system should award trade preferences to those developing countries that are genuinely interested in the well-being of their workforce. And relatedly, countries should not be able to build an artificial competitive advantage by abusing workers rights. Secondly, well-functioning labour market institutions, built on respect for core labour standards, can enable developing countries to capture their fair share of the gains from international trade, and critically, to ensure that those gains are equitably shared. As G20 nations recognise, respect for core labour standards, along with the other pillars of the ILO's Decent Work Agenda, are central to promoting global sustainable and equitable economic recovery.

a no profit organisation
Belgium
trade
YES

other
Belgium

Representing working people in all sectors throughout Europe ---- European Trade Union Confederation

The European Trade Union Confederation represents 82 trade union organisations in 36 European countries, plus 12 industry-based federations. It is recognised by the European Institutions for the purposes of cross-sectoral dialogue under the Treaties.

We welcome the opportunity to respond to areas of specific interest to us in the public consultation on the proposed revision of the European Union Regulation on the Generalised System of Preferences (GSP).

We reserve the right to expand on this response in the light of the discussions that will take place around the Commission proposals.

The EU's GSP system is an important instrument of EU trade policy in assisting developing countries to gain more revenue and growth from trade, and through its incentive structures, to link this with the promotion of sustainable development and good governance.

Trade unions have long argued that the GSP system should award trade preferences to those developing countries that are genuinely interested in the well-being of their workforce. And relatedly, countries should not be able to build an artificial competitive advantage by abusing workers' rights. Secondly, well-functioning labour market institutions, built on respect for core labour standards, can enable developing countries to capture fair gains from international trade, and critically, ensure that those gains are equitably shared.

As G20 nations recognise, respect for core labour standards, along with the other pillars of the ILO's Decent Work Agenda, are central to promoting global sustainable and equitable economic recovery. The GSP regulations evolved in 2005 to provide a clear linkage between respect for the ILO's Core Labour Standards and trade preferences, resulting in some success. Several countries have ratified ILO core conventions in order to be eligible for additional trade preferences. Further, since Belarus was suspended from the GSP in 2007 for violating labour standards it has taken some steps to improve its implementation in the hope of rejoining the system. However, in general the impact of the system on actual improvement of labour standards is much less clear, especially given the scheme's lack of transparency and benchmarks to measure progress by. Further, the general trend of preference erosion and the low take-up of the GSP+ component threaten the scheme's long term effectiveness. To improve

the effectiveness of the scheme to deliver on its objectives, and ensure the confidence of working people globally, the revised GSP regulation should have (consultation questions in brackets):

- Clearer definitions and benchmarks of effective implementation and for the temporary withdrawal provisions (see questions 20, 27, 28, 32)
- Stronger and more transparent processes for monitoring compliance, conducting investigations and assessing applications (questions 20, 26)
- Better incentives and more targeted technical assistance to help developing countries drive improvements in implementation. (Question 20)
- Clearer and more consultative procedures for filing a complaint, commencing an investigation, approving applications, and readmitting countries to the scheme (including role of the European Parliament) (see questions 33)
- Clearer and improved role for social partners in monitoring compliance and triggering investigations (questions 26, 33)

other

Belgium

Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)

EBCA believes that the GSP is an important tool to help developing countries build the business infrastructure they need to make economic progress and alleviate poverty. It contributes to the competitiveness of products from developing countries with spill-over effects on local investments and employment and wealth in general. In this regard the GSP is effective and should be continued. Nevertheless it could be improved especially where the current provisions are not transparent and negatively impact on legal predictability.

other

Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)

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- Stronger and more transparent processes for monitoring compliance, conducting investigations and assessing applications (questions 20, 26)
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- Clearer and more consultative procedures for filing a complaint, commencing an investigation, approving applications, and readmitting countries to the scheme (including role of the European Parliament) (see questions 33)

- Clearer and improved role for social partners in monitoring compliance and triggering investigations (questions 26, 33)

other

Belgium

advising our members, interest representation ---- Cefic

As a matter of principle, we hold the view that multilateral elimination of all tariffs (including agricultural tariffs) within the framework of the WTO would serve the interests of developing countries best.

On the one hand, all trading partners would enjoy duty-free access to the European market. Many developing and emerging countries especially complain about the difficulty to access the European agricultural market, because they are highly competitive in the agricultural sector. On the other hand - as historic experience shows - it would be in the very own interest of developing and emerging countries to open their markets: in the short- and medium-term this leads to the building up of own competitive industries, export orientation, and economic growth and prosperity. Therefore, unilateral tariff preferences should be granted only to truly needy countries - i.e. LDCs - who do not manage to integrate in the global economy by their own efforts. Therefore, we believe that the special arrangement of EBA ("Everything but arms") is a useful instrument of development aid. By contrast, we think that it is counterproductive to grant - within the GSP - unilateral tariff preferences to high-income economies (e.g. Gulf countries).

Meanwhile, these countries are globally competitive with many products and no longer need the GSP. In the following we will come back again on this issue. Furthermore, the European chemical industry is of the opinion that countries making use of unfair practices such as dual-pricing systems and export taxes should be removed from the GSP scheme. These unfair practices distort trade and investment flows and undermine the competitiveness of the European chemical industry.

Dual-pricing and export taxes will most likely not be prohibited by the WTO in the near future. Yet, countries making use of these practices should not be 'rewarded' with preferential access to the European market. For many years, the chemical industry has been actively advocating an elimination of chemical tariffs worldwide under the auspices of the WTO. Especially emerging countries are vehemently opposing this proposal in Geneva. Moreover, granted preferences are invoked by developing countries as a pretext for rejecting further liberalization ("erosion of preferences"). Thus the system of preferences results in a denial of the WTO's liberalization mandate. In addition to this answer to Q1 and before entering into the questionnaire as a whole we would like to present our general position regarding the future of the GSP.

Cefic Position on GSP Are autonomous preferential tariff measures still suitable as a modern instrument of the EU Development Policy?

I. The GSP as a development and trade policy instrument Since 1971 the European Union (EU) has been linking development policy goals with the trade policy instrument of unilateral tariff preferences for developing countries. This is done through the Generalised System of Preferences (GSP). This EU's own system aims to facilitate access for products from currently 176 developing countries, enabling them to more easily participate in the international market. Based on the GSP, beneficiary countries are granted - fully or partly - tariff-free access to the single market of the European Union.

The existing GSP provides for the following tariff preferences:

- a. A general arrangement for unilateral tariff preferences for currently 176 beneficiary countries and over 6200 tariff lines.
- b. A special arrangement as an incentive for sustainable development and good governance; the so-called GSP+ grants wider tariff preferences to beneficiary countries which fulfill certain criteria. In total, 14 countries meet GSP+ criteria.
- c. A special arrangement for least-developed countries (LDCs): the so-called 'Everything but arms' initiative. Currently 49 countries - identified by the World Bank as LDCs - enjoy tariff- and quota-free access to the Community market.

Tariff preferences are aimed at reducing poverty in developing countries, trigger sustainable development and encourage good governance. This 'counterpart' of development aid also enables EU producers to benefit from cheaper access to input materials from those countries. Details for the concrete shaping of the system and for adapting it to new developments are laid down in time-limited guidelines and regulations: most recently in Council Regulation (EC) No

732/2008, which will expire on 31 December 2011. This methodology identifies beneficiary countries, products covered by the system and preference margins. Furthermore, it decides on the part-exclusion of individual countries from the GSP in a product-related approach, when competitiveness is achieved in the manufacture of certain products (so called graduation). As a matter of principle, the GSP makes no differentiation between developing and emerging countries.

Many developing and emerging countries as well as numerous EU producers have benefitted from the GSP. However, globalisation has brought about major changes in worldwide economic structures. Therefore, this raises the question whether the GSP is in need of fundamental revision.

II. Changing economic situation for producers in beneficiary countries To date EU chemical producers are noting that developing countries and especially emerging countries have the prerequisite production know-how, adequate production plants and capital providers for the production of specific products from the chemical production range. Consequently, these countries are increasingly taking up a role as competitive suppliers of chemical products on the world market and can no longer be regarded as 'in need of development' with respect to these products. Production in these countries is less costly than in the EU (labour and raw material costs) and frequently encouraged by subsidy-like measures ('dual pricing'). Additionally, the EU grants tariff preferences.

One good example is polycarbonate. Large quantities of this plastic material are used in industrial production worldwide (global demand in 2008: ca. 3.000 kilotons), e.g. for compact discs, car headlights, packagings, displays and many more applications. European producers were leading in this field for a long time. But meanwhile the situation has changed fundamentally. Today some beneficiary countries are operating large chemical plants and building new ones. Existing plants and plants under construction meet the state-of-the-art; their products meet the highest standards. Furthermore, capacities of plants enable them to exceed by far the demand on local markets - with production being planned for world market requirements.

Another interesting development is that for strategic reasons investors favour beneficiary countries as locations for such plants. Conversely, many beneficiary countries charge high import tariffs on such products. In their efforts to succeed on the market, EU exporters might adapt pricing policies, which can rapidly bring them under the suspicion of dumping - with the danger of impacted beneficiary countries taking relevant protective measures. Thus we note increasing global competitiveness from beneficiary countries for certain product ranges on the one side, and disadvantages for European producers of the same products on the other.

These 'home-grown' disadvantages for European producers cannot be reconciled with the goals of the Communication from the European Commission 'Global Europe - Competing in the world' (COM(2006) 567 final), where the Commission advocates reciprocity in the opening of markets: 'Our core argument is that rejection of protectionism at home must be accompanied by activism in creating open markets and fair conditions for trade abroad. This improves the global business environment and helps spur economic reform in other countries ... But most emerging countries combine high growth with unnecessarily high barriers to EU exports. As their role and the benefits they draw from the global trading system grow, so too do their responsibilities to play a full part in maintaining a global regime that favours openness.' (cp. pages 5,6)

III. Impacts of the GSP on WTO negotiations and FTA negotiations For many years, the chemical industry has been actively advocating for elimination of chemical tariffs worldwide under the auspices of the WTO. Especially emerging countries are vehemently opposing this proposal in Geneva. Moreover, granted preferences are used as a pretext by developing countries for rejecting further liberalization ('erosion of preferences'). Thus the system of preferences results in a denial of the WTO's liberalization mandate.

The European Union is engaged in numerous negotiations with developing and emerging countries aimed at full tariff liberalization. Such free trade or economic partnership agreements are much appreciated alternatives to WTO. Unfortunately, it is noted that some negotiating partners of the EU see existing preferences as a matter of course and refuse to take reciprocal measures for contractually agreed tariff elimination. Here, the GSP adversely affects the EU's negotiating position.

IV. The key question: does the GSP still serve its purpose? From the chemical industry's viewpoint, it is today no longer possible to purposefully merge development and trade policy goals within a system which does not take into account changes in global trade. If the goal is, on the one hand, to lastingly ensure the EU's future as an industry location whilst simultaneously strengthening the competitiveness of European industry and, on the other hand, the goal of full tariff liberalization is to be really achieved, there is no room left for the GSP in its present form. The EU must prepare for this new situation and set the course for the future as soon as possible.

V. Future of the GSP The existing GSP is based, inter alia, on the following three principles: - a generous tariff offer, - orientation to the neediest countries, - transparent graduation with a stronger focus on the most important beneficiaries. A generous tariff offer is made with Regulation (EC) No 732/2008 (GSP Regulation). 1. Selection of GSP beneficiaries (Article 3) According to Article 3 of the existing Regulation, a beneficiary country is removed from the scheme a. when it has been classified by the World Bank as a high-income economy during three consecutive years, AND b. when the value of imports for the five largest sections of its imports covered by the GSP into the Community represents less than 75% of the total GSP-covered imports from the beneficiary country into the Community ('diversification criterion'). We believe that the above criteria are in need of fundamental revision. First of all, a beneficiary country should be removed from the scheme as soon as it has been classified by the World Bank as a high-income country - and not only after an observation period of three years. This step should be taken irrespective of the country's export structure. For example, today all Gulf States are GSP beneficiaries. But according to the World Bank, they are high-income countries and their gross per capita income exceeds that of some EU Member States.

Moreover, the diversification criterion can bring arbitrary and erratic results, because only GSP-covered exports - and not total exports - of a country are analyzed. A country can have a highly diversified export structure, where possibly only exports under GSP are not diversified. Consequently, this criterion might give a very wrong picture of a country's export structure. In order to realistically reflect the export structure of a country, the diversification criterion should examine its total exports and not only exports covered by the GSP.

In the long term, abolishing the GSP should be considered. We think that the special arrangement of 'Everything but arms' (EBA) sufficiently ensures support for really needy countries. 2. Removal of tariff preferences for products (Article 13)

We urge to create a fundamental balance between the development-political offer of the EU to beneficiary countries and the preservation of a level playing field for competitive companies from beneficiary countries and from the EU alike. Put simply: products, which are offered at competitive conditions on the international market, should no longer enjoy GSP advantages - with this step to be taken in a timely manner.

New yardsticks for observation and action should apply, also taking into account the breathtaking speed in the development and spreading of new technologies, the subsequent concept and planning phase for production plants or entire industry locations and, finally, the market entry of products.

Today this sequence of events happens within such short periods of time that a removal of tariff preferences under existing rules of Article 13 of the GSP Regulation can no longer prevent damage to EU producers. For this reason, too, observation periods need to be shortened decisively. Graduation, which is based on the removal of tariff preferences for all products of an entire section, is no longer adequate today.

The GSP concept should take account of the fact that not the products of one section as a whole, but selected, individual products of one industry enable emerging countries to competitively participate in international market activities. Consequently, there must be the possibility to individually remove tariff preferences for such competitive products.

VI. Conclusion Against the backdrop of globalization - which brings fundamental changes in the international division of labour and in global supply chains - the Generalised System of Preferences (GSP) no longer reflects the present-day situation. In the long term, the GSP should be replaced by binding agreements on multilateral or bilateral tariff elimination. The existing GSP is rather an obstacle in relevant negotiations, because trading partners either oppose liberalization ('erosion of preferences') or they offer no concessions (FTA negotiations). Moreover, the GSP does not sufficiently take into account the increased competitiveness of emerging countries.

The goal of maintaining and enhancing the competitiveness of local industry, which ranks among the stated goals of the European Union, is in danger due to overly rigid adaptation rules of the GSP. The European chemical industry advocates for a fundamental revision of the GSP and an abolition of this system for industrial products in the long term.

This revision should focus on the competitiveness of local industry. The EU should conclude free trade agreements with emerging countries, with both parties committing themselves to contractually binding tariff elimination and provisions on other trade issues. The least-developed countries (LDCs) should continue to benefit from the development-promoting elements of the GSP, in particular from the special arrangement 'Everything but arms'. Relevant legislation should be improved as early as in the periodic review of the GSP Regulation for the period 2012 to 2015 or, at the latest, in the review of political guidelines for the period 2016 to 2025. These improvements should concern the list of beneficiary countries and the graduation of individual products.

VII. Summary and recommendations

- In the Communication of 2006 'Global Europe - Competing in the world' the Commission criticizes 'unnecessarily high barriers to EU exports' in emerging countries and calls upon emerging countries to face up to their responsibilities in the global trading regime.
- The GSP no longer adequately addresses present-day global economic conditions and should be completely abolished for industrial products in the long term.
- In the medium term, the EU should conclude free trade agreements with all emerging countries, enabling European industry to benefit from free trade with these countries.
- The European Union should continue to grant preferences to the least-developed countries (e.g. through the 'Everything but arms' initiative).
- In the short term, the following measures should be taken:
 - Enable the graduation of individual products.
 - Remove high-income economies without delay from the GSP scheme.
 - Remove countries making use of unfair practices such as dual-pricing and export taxes without delay from the GSP scheme.

a no profit organisation

Belgium, Brussels

leather sector. COTANCE represents interests of National Associations of Tanners and Dressers

The GSP can be a valid instrument for development if it truly provides its benefits for products and countries that deserve them. It thus depends on how the scheme works and how it manages the market access advantages offered to beneficiary countries.

The current EU GSP Scheme needs to be corrected for fulfilling its purpose.

Therefore, care of the following should be taken:

that for certain products a few countries do not monopolise the benefits; i.e.

that their market presence for the products concerned relegate competitors (other GSP beneficiaries) to a marginal market position in the EU;

that sections of products are structured so as to reflect the value adding process in value chains; i.e. that raw materials, intermediate products and finished products are not mixed up in a section of products. Certain economic sectors such as "Leather" would require a better definition of sections, similarly to the solution applied in the textile and clothing sector.

that rules limiting raw materials restrictions in the GSP are introduced. Countries applying export taxes or export restrictions on raw materials in certain products are denied the benefits of the GSP for all the more value added products made with that input, e.g. if a country applies an export tax on hides, skins or wet-blue, then the GSP benefits should be withdrawn for that country's exports of finished leather, leather goods, leather footwear, leather garments and all other leather based products or components.

that countries are graduated for certain products according to an automatic procedure where the fulfilment of certain simple and relevant criteria leads to a notification and further implementation of the MFN conditions.

that graduation and withdrawal of benefits to countries and products are implemented with a procedure that takes a maximum of 4-6 month.

that safeguard, graduation or withdrawal of benefits take into account the competitiveness of the products of a country on the global market (and not only in the EU) as with today's globalised value and supply chains, the main markets for certain products (notably intermediate products) are no longer in the EU but in third countries. A country's dominant position for

certain products on the global market for the products concerned should determine whether it deserves or not GSP treatment.

a no profit organisation

Bolivia

Exportaciones

Consideramos que es un instrumento esencial para el desarrollo de nuestros países, por lo tanto debe tener continuidad.

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

Yes, we think that GSP is a valid trade instrument, it should be continued because is very important for bolivian companies who want to export to EU. No we are working with SME to prepare them for export to EU

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

El SGP si es un instrumento válido para el desarrollo de los países y debe continuar como esquema de preferencias arancelarias que incrementen los niveles de productividad y competitividad de las economías en vías de desarrollo.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

Yes, its benefits should be renewed for the developing countries. In the case of Bolivia, exports grew a lot between 2005 and 2009. It facilitates the entrance of foreign currency, allows the generation of employment, raises the quality of Bolivian products and helps bolivian citizens to improve their income

a no profit organisation

Bolivia

industry

I consider GSP+ as an essential scheme that allows poor and those countries that have not negotiated trade agreements with the EU to access the European market.

other

BOLIVIA

EXPORTS ---- Government representative

YES

other

Bolivia

Government ---- Government Official

The GSP is a very useful instrument for developing countries like Bolivia, and it has had very positive impacts for Bolivian producers. Therefore it is of vital importance to maintain its application.

other

Bolivia

Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio

Consideramos que es un instrumento esencial para el desarrollo de nuestros países y debe tener continuidad.

a business association

Brazil

industrial sector

Yes, the GSP is a valid instrument to ensure the development of countries in need, as it contributes to the diversification of international trade, poverty reduction and the promotion of good governance.

other

Brazil

Government ---- Ministry of External Relations - Federative Republic of Brazil

The GSP for developing countries, as approved by 1971 waiver decision and inserted in the Enabling Clause in 1979, is an important mechanism for promoting trade as an instrument for development. It has been an important program for supporting increased economic growth and export performance, which helps sustain numerous sectors in developing economies. In this sense, the EU GSP serve as a competitiveness balance factor, by granting preferential access to products that otherwise would not be able to access the European market.

a citizen

Cambodia

Garment Industry

Yes

a company

Cambodia

Export

Yes, it is. It shall be continued.

other

Colombia

Tourism and Trade (Import-Export) ---- Government of Colombia

Colombia believes that the main GSP (such as GATT Contracting Parties adopted it in 1971) and especially the GSP plus have been and will continue to be valuable tools for growth and development of beneficiary economies. In the case of Colombia, it has become a key tool for some of our industries highly generators of employment, particularly of non-qualified workforce and where a high percentage are women heads of families. Sectors which have these features include tuna, shrimp, flowers, tropical fruits, bananas, vegetables, oil palm, among others. For the industrial sectors, this has meant greater productive development, an attraction for foreign investment and greater participation in Colombian exports with benefits on qualified employment. Products derived from sugar and cocoa, food, and articles of leather, paper and books stand out in this regard.

a company

Colombia, Sur América

Consultoría

Sí

a business association

Ecuador

Ecuadorian Exportes Federation

En términos generales, el Sistema Generalizado de Preferencias como mecanismo de política comercial no recíproco y no discriminatorio y como tal es un instrumento válido para el desarrollo y debería mantenerse, ampliarse y profundizarse. Durante el tiempo en que el esquema preferencial ha estado en vigencia el comercio del Ecuador se ha expandido y diversificado. Desde que el SGP Droga entró en vigencia en 1991, según el Banco Central del Ecuador, las exportaciones del Ecuador amparadas en este sistema pasaron de US\$ 118.5 millones de dólares en el año 1990 a aproximadamente US\$ 800 millones en el año 2009, alcanzando un record de exportaciones bajo este esquema en el año 2007, con aproximadamente US\$ 1.100 millones. El comercio involucra a una gama de actores amplia en las diferentes cadenas de producción y en las mismas participan pequeños y medianos productores que se suman a los beneficiarios de la expansión del comercio. Lo propio ocurre con la diversificación de exportaciones que atrae a nuevos actores. Una mayor participación en el comercio generada por un esquema preferencial como el SGP+ constituye un motor de

desarrollo para países pequeños como el Ecuador, en especial para el caso de segmentos de la población menos aventajadas.

a business association

Ecuador

Tuna Industry

Yes it is a valid instrument and should be continued.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

The Generalized System of Preferences of the European Union is a valid instrument for development and should be maintained and deepened. In the case of Ecuador the contribution of exports made under this regime to non oil GDP has been above 2.5% in average during the last 5 years. Although access to the European market for various developing countries has increased, a review on how to enhance the use of the preferences is still pending in order to fulfill the objectives for the creation of this system.

For that effect, it is necessary not only to improve trade conditions but also to implement complementary initiatives in areas related to fight against poverty and sustainable development, for example an increase in co-operation for the development of these objectives in the beneficiary countries.

Since the implementation of the so called GSP Drugs in 1991 Ecuadorian exports to the European Union in the tariff items which benefit from this system have experienced a highly dynamic growth. According to Banco Central del Ecuador [Central Bank of Ecuador] figures exports of Ecuador under this system went from 118.5 million of US dollars in 1990 to 722 million of US dollars in 2009 approximately, reaching a peak of 1154 million of US dollars in 2007.

In order to fulfill the objectives of this system the European Union shall maintain an unequivocal compromise with the Enabling Clause (Decision of 28 November 1979 L/4903) and the WTO Appellate Body Report in the case WT/DS246/AB/R "European Communities-Conditions for the Granting of Tariff Preferences to Developing Countries", which state that:

- Any differential and more favourable treatment provided under the Enabling Clause shall in the case of such treatment accorded by developed contracting parties to developing countries be designed and, if necessary, modified, to respond positively to the development, financial and trade needs of developing countries.
- With regard to these three types of needs, the Appellate Body in the case WT/DS246/AB/R rule that "the existence of a development, financial or trade need must be assessed according to an objective standard".
- Broad based recognition of a particular need, as set out in the WTO Agreement or in multilateral instruments adopted by international organizations, could serve as such a standard.
- Likewise, it lies down that it shall exist "a sufficient nexus between, on the one hand, the preferential treatment provided under the respective measure, and, on the other hand, the likelihood of alleviating the relevant development, financial or trade need." Finally, it establishes that only if a preference-granting country acts in the positive manner suggested, in response to a widely-recognized development, financial or trade need, can such action satisfy the requirements of paragraph 3(c) of the Enabling Clause.
- According to the object and aim of the WTO Agreement and the Enabling Clause a requisite for granting preferences is that such preferences do not imply reciprocity from beneficiaries.
- The Enabling Clause does not subordinate the concession of tariff preferences to the obedience or fulfillment of certain trade policy but to the fact of being situated at the same level of development and, therefore, having common development, financial and trade needs, established objectively and widely recognised.
- As the Appellate Body states in the case WT/DS246/AB/R any differential and more favourable treatment shall be designed to "facilitate and promote the trade of developing countries" and to respond "positively to their development, financial and trade needs". Specifically it recognizes that the word "positively" "consists in or is characterized by constructive action or attitudes".

a business association

Finland

Trade Policy

Yes. It is a valid trade instrument for development, but it should be made more user-friendly and better promote trade and investment between the the beneficiary countries and the EU.

a business association

Finland

Pulp, paper, paperboard and wood products industries interest representation

The GSP should be developed more towards the least developed countries. The poorest states need more support, not the richest in this GSP category.

a company

Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.

Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products

It may be a valid instrument for the Least Developed Countries. It should be focused on the Least Developed Countries.

a business association

France

MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies

As a matter of principle, MEDEF thinks that a multilateral reduction of tariffs within WTO would serve best for Developing countries. In particular, the “duty free - quota free” commitment decided in Hong Kong in 2005 should get in force. Europe is known as the most open market. It has developed a comprehensive and generous Development policy of which GSP is one tool. While generously opening up the EU market to imported products for Developing countries, the EU GSP is a relevant trade instrument for Development. Its entire set of modalities have remained valid even if some of them should be updated to the current trade landscape (especially to a better differentiation between Emerging countries and Developing countries) and in order to avoid any overlapping of preferential access (due to EPA for ACP countries, FTAs with Developing countries...). This instrument must be coherent with the reform of the Preferential Rules of Origin.

a business association

France

Textile

The GSP system is a valid trade instrument. The objectives essentially to combating global poverty, promote sustainable and enhance good governances practices are elements in favour of trade development.

a business association

France

Fishery products - Tuna

1. The current architecture of the scheme (Standard GSP, GSP + and EBA) is working well and should not be changed. Especially the GSP+ should be maintained as a pillar regime in the successor regulation.

a business association

Germany

Industry

As a matter of principle, we hold the view that a multilateral elimination of all tariffs (including agricultural tariffs) within WTO would serve best for developing countries. On the one side, all trading partners would enjoy duty-free access to the European market. Many developing and emerging countries have hard feelings especially about the difficultly accessible European agricultural market, because they are highly competitive in the agricultural sector.

On the other side - as historic experience shows - it would be in the very own interest of developing and emerging countries to open their markets: in the short- and medium-term this leads to the building up of own competitive industries, export orientation, and economic

growth and prosperity. Therefore, unilateral tariff preferences should be granted only to truly needy countries - i.e. LDCs - who do not manage to integrate in the global economy by their own efforts. Therefore, we believe that the special arrangement of EBA ("Everything but arms") is a useful instrument of development aid. By contrast, we think that it is counterproductive to grant - within the GSP - unilateral tariff preferences to high-income countries (e.g. Gulf States). Meanwhile, these countries are globally competitive with many products and no longer need the GSP. In the following we will come back again on this issue.

For many years, the German industry has been actively advocating an elimination of industrial tariffs worldwide under WTO. Especially emerging countries are vehemently opposing this proposal in Geneva. Moreover, granted preferences are used as a pretext for rejecting further liberalization ("erosion of preferences"). Thus the system of preferences results in a denial of the WTO's liberalization mandate.

In addition we would like to present our general position to the future GSP as follows:

Evaluation of GSP: Introduced back in 1971, GSP no longer does justice to the EU's development and trade policy objectives due to differentiated developments in the global economy with a changed division of labour and global supply chains. As a result, it has been overtaken by events and is in need of reform. Specifically, BDI points out that:

- GSP takes insufficient account of the development status of beneficiary countries. The current system favours countries which exhibit sharp differences in terms of growth, trade volume, per capita income, level of industrialisation and poverty rate. For instance, GSP currently benefits states in the Gulf Cooperation Council, even though they sometimes have a higher per capita income than individual EU member states. The two largest beneficiaries of GSP are the emerging countries Brazil and India, which are now competitive in individual sectors. Although European manufacturers also benefit from lower import duties for intermediate products, it is clear that GSP does not meet its own benchmark of promoting the poorest developing countries.
- GSP generates unjustified competition disadvantages for EU companies. Many GSP beneficiaries today have a technically high level of know-how as well as the capital flows they need to position themselves as competitive suppliers on international markets. Individual developing and emerging countries have evolved into serious competitors of European producers in a range of market segments but benefit from GSP at the same time. Customs preferences for these sectors distort international competition.
- Unilateral customs reductions for internationally competitive countries/sectors are in contradiction with the objectives of the European Commission's trade strategy "Global Europe", in which a competitive Europe should be achieved in a global world through reciprocal market opening.
- The EU wants to conclude free-trade agreements with GSP beneficiary countries. However, with GSP, the EU weakens its own position because the unilaterally low preferential customs rates considerably restrict its room for negotiation.
- GSP increases resistance to customs reductions at multilateral level. Developing and emerging countries object to general customs reductions in WTO negotiations since this would result in them losing the relative competitive advantage they enjoy vis-à-vis other countries thanks to GSP ("erosion of preferences").
- Via GSP, products which are imported into the EU with customs which are often subsidised in the country of origin through measures such as dual-pricing. At the same time, an EU exporter often has to pay excessively high customs duties on imports of the same products into the GSP-preferred country. Considerable competitive disadvantages for European producers are caused by these market distortions. Article 15 of the GSP regulation which provides for temporary withdrawal of preferences in the event that a country systematically applies unfair commercial practices to the detriment of EU companies has proved to be ineffective. These unfavourable developments are fostered by the following points:
 - The diversification criterion takes insufficient account of a country's export structure, since only 6,300 of around 11,000 EU customs lines are incorporated in GSP. Under GSP, a country can exhibit a one-sided export structure even though it is sufficiently diversified overall.
 - The current graduation concept is today no longer appropriate, since many beneficiary countries exhibit major differences in the international competitiveness of products within a product section. Moreover, the time lag between the reference period for updating the graduation mechanism and the time when the update is actually implemented is too long. This delay and the rapid development and dissemination of new technologies lead to globally viable products from preference countries not being removed from GSP at an early stage and hence the competitiveness of EU companies is damaged by the EU's own GSP system.

- The safeguard clause (article 20) theoretically offers the possibility, on the initiative of member states or the Commission, of reversing customs preferences for individual products if the favoured imports threaten to place an EU producer in a difficult situation. In practice, the safeguard mechanism is not triggered due to foreign and/or development policy considerations as well as possible retaliatory measures by the partner country against EU companies.
- GSP's rules of origin are complex and opaque. The bureaucratic effort this generates leads to the preferences not being adequately used by the main target group - small and medium-sized enterprises in preference countries. Furthermore, complex origin rules make it difficult for customs authorities to police and hence promote misuse of GSP. In consequence, individual preference countries act only as transit points for products from non-preferred countries on their way into the EU. BDI's requests: BDI calls for a fundamental and rapid revision of GSP. The new rules must take account of dynamic developments in EU partner countries and be incorporated in the Commission's new trade policy strategy.

Specifically, BDI calls for:

- Every effort must be made to avoid an extension of the current regulation and the corresponding guidelines beyond 31 December 2011, and the roll-over should be kept as short as possible otherwise.
- The new GSP regulation should provide for more effective possibilities for beneficiary countries (excepting least developed countries) to be excluded totally or partially from preferences if these run counter to the EU's development or trade policy interests. This is the case, for example, if negotiations are opened on a bilateral free-trade agreement.
- If a recipient country is classified as a high-income country by the World Bank, it must be excluded from GSP at the next year-end irrespective of its export diversification.
- The diversification criterion must take account of a country's total exports into the EU and not only the exports covered by GSP. This also applies for the rules governing exclusion from graduation.
- Graduation should also be possible on a targeted basis for individual positions and sub-positions of a product section if the producers in the preference countries are internationally competitive.
- The observation phase in the framework of graduation should be shortened to one year.
- The current GSP rules of origin should be structured simply and efficiently, and correspond to an EU standard.
- Partner countries' legally binding customs papers must continue to be recognised and should not be replaced by self-declarations by companies in the beneficiary country.
- The conditions for granting GSP+ should also include ratification and implementation of international agreements on protection of intellectual property and on public procurement and encompass dismantling of export restrictions on raw materials.
- In the long term, the cohort of favoured countries should be limited to least developed countries and only the simple system of "everything but arms" should still apply.

a company
GERMANY
PHARMA/CHEMICALS

As a matter of principle, we are supporting the opinion that the multilateral elimination of all tariffs within the framework of the WTO would serve as a more appropriate tool for further development and sustainable economic growth.

The EU should conclude free trade agreements with emerging countries, with both parties committing themselves to contractually binding tariff elimination and provisions on other trade issues. The least-developed countries (LDCs) should continue to benefit from the development-promoting elements of the GSP, in particular from the special arrangement 'Everything but arms'.

GSP could further be a valid instrument for development, provided that a fundamental revision is performed, so that it can become an effective instrument to secure/restore fair competition. Within the context of globalization, which brings fundamental changes in the international division of labour and in global supply chains, the GSP, in its current form, does no longer reflect the realities of the worldwide situation.

Unilateral customs reductions for internationally competitive countries/sectors are in contradiction with the objectives of the European Commission's trade strategy "Global Europe", in which a competitive Europe should be achieved in a global world through reciprocal

market opening. GSP increases resistance to customs reductions at multilateral level. Developing and emerging countries object to general customs reductions in WTO negotiations since this would result in them losing the relative competitive advantage they enjoy vis-à-vis other countries thanks to GSP ("erosion of preferences").

We are of the opinion that it is today no longer possible to purposefully merge development and trade policy goals within a system which does not take into account changes in global trade. First of all, GSP takes insufficient account of the development status of beneficiary countries. The current system favours countries which exhibit sharp differences in terms of growth, trade volume, per capita income, level of industrialisation and poverty rate. For instance, GSP currently benefits states, even though they sometimes have a higher per capita income than individual EU member states. The two largest beneficiaries of GSP are the emerging countries Brazil and India, which are now competitive in individual sectors.

Although European manufacturers also benefit from lower import duties for intermediate products, it is clear that GSP does not meet its own benchmark of promoting the poorest developing countries. Via GSP, products are imported into the EU with customs which are often subsidised in the country of origin through measures such as dual-pricing. At the same time, an EU exporter often has to pay excessively high customs duties on imports of the same products into the GSP-preferred country. Considerable competitive disadvantages for European producers are caused by these market distortions.

Article 15 of the GSP regulation which provides for temporary withdrawal of preferences in the event that a country systematically applies unfair commercial practices to the detriment of EU companies has proved to be ineffective. There are also further elements to be emphasized. The diversification criterion takes insufficient account of a country's export structure, since only 6,300 of around 11,000 EU customs lines are incorporated in GSP.

Under GSP, a country can exhibit a one-sided export structure even though it is sufficiently diversified overall.

The current graduation concept is today no longer appropriate, since many beneficiary countries exhibit major differences in the international competitiveness of products within a product section. Moreover, the time lag between the reference period for updating the graduation mechanism and the time when the update is actually implemented is too long. The reference/observation period is based currently on more than two or more years-old (historical) data. This delay and the rapid development and dissemination of new technologies lead to globally viable products from preference countries not being removed from GSP at an early stage and hence the competitiveness of EU companies is damaged by the EU's own GSP system.

The safeguard clause (article 20) theoretically offers the possibility, on the initiative of member states or the Commission, of reversing customs preferences for individual products if the favoured imports threaten to place an EU producer in a difficult situation. In practice, the safeguard mechanism is not triggered due to foreign and/or development policy considerations as well as possible retaliatory measures by the partner country against EU companies.

Taking into account the above mentioned elements, we would like to further underline the considerations we support with regard to the future of the GSP.

1. Selection of GSP beneficiaries (Article 3) According to Article 3 of the existing Regulation, a beneficiary country is removed from the scheme: a. when it has been classified by the World Bank as a high-income economy during three consecutive years, AND b. when the value of imports for the five largest sections of its imports covered by the GSP into the Community represents less than 75% of the total GSP-covered imports from the beneficiary country into the Community ('diversification criterion').

We support the opinion that the above criteria are in need of fundamental revision. First of all, a beneficiary country should be removed from the scheme as soon as it has been classified by the World Bank as a high-income country - and not only after an observation period of three years. This step should be taken irrespective of the country's export structure. Moreover, the diversification criterion can bring arbitrary and erratic results, because only GSP-covered exports - and not total exports - of a country are analyzed. A country can have a highly diversified export structure, where possibly only exports under GSP are not diversified. Consequently, this criterion might give a very wrong picture of a country's export structure. In order to realistically reflect the export structure of a country, the diversification criterion should examine its total exports and not only exports covered by the GSP.

2. Removal of tariff preferences for products (Article 13) We are supporting the view that it is necessary to create a fundamental balance between the development-political offer of the EU to beneficiary countries and the preservation of a level playing field for competitive companies from beneficiary countries and from the EU alike. Therefore, products, which are offered at competitive conditions on the international market, should no longer enjoy GSP advantages - with this step to be taken in a timely manner.

New yardsticks for observation and action should apply, also taking into account the breathtaking speed in the development and spreading of new technologies, the subsequent concept and planning phase for production plants or entire industry locations and, finally, the market entry of products. Today this sequence of events happens within such short periods of time that a removal of tariff preferences under existing rules of Article 13 of the GSP Regulation can no longer prevent damage to EU producers. For this reason, too, observation periods need to be shortened decisively.

Graduation, which is based on the removal of tariff preferences for all products of an entire section, is no longer adequate today. The GSP concept should take account of the fact that not the products of one section as a whole, but selected, individual products of one industry enable emerging countries to competitively participate in international market activities. Consequently, there must be the possibility to individually remove tariff preferences for such competitive products. As a conclusion, we would like to emphasize the opinion that, in the long term, the replacing of the GSP by binding agreements on multilateral or bilateral tariff elimination might be considered as an option. In the short term, the following measures should be taken: enable the graduation of individual products, remove high-income economies without delay from the GSP scheme, remove countries making use of unfair practices such as dual-pricing and export taxes without delay from the GSP scheme. Trade reviews should be done on the basis of more actual data and less history data. For example, for a review to be done in 2011, data from 2009 and 2010 have to be considered. This aspect is linked with the specific dynamic of the current worldwide situation.

a company

Germany

chemical sector

First of all, BASF is an ardent supporter of a further elimination of chemical (but also agricultural) tariffs worldwide under the WTO umbrella.

Liberalization under the WTO umbrella hereby serves as most appropriate tool for further (global) development and sustainable economic growth and prosperity. GSP could be a valid trade instrument for development, if it is used properly i.e. in line with the EU's development objective to eradicate poverty and to spur economic growth and prosperity in countries in need of it. GSP unilateral tariff preferences should only be granted to the truly needy countries - i.e. LDCs - which are vulnerable and not well integrated in the global economy.

The EBA ("Everything but arms") therefore remains the most valid instrument. BASF therefore thinks that it is counterproductive and unfair to grant unilateral GSP tariff preferences to high-income countries. These countries, with already high income per capita levels, are to date globally competitive with many (chemical) products.

Furthermore, we consider that countries which make use of unfair practices such as dual-pricing systems and export taxes should be removed from the GSP scheme. These unfair practices distort trade and investment flows and undermine the competitiveness of the European chemical industries.

Dual-pricing and export taxes will most likely not be prohibited by the WTO in the near future. Yet, countries making use of these practices should not be 'rewarded' by preferential access to the European market. At this moment, especially emerging countries, are opposing a further elimination of chemical tariffs in the WTO context. Granted preferences by EU are hereby used as a pretext for rejecting further liberalization ("erosion of preferences"). Thus, the system of preferences hereby hinders further liberalization rounds under WTO mandate. This should be avoided in any event.

a company

Germany

Think-tank for European and international economy and governance

Yes

a company
Germany

Yes, we consider that the GSP is an important instrument helping to promote development and to reduce poverty through granting tariff preferences and/or duty free treatment for products from developing and in particular from least-developed countries.

a company
germany
chemical production

in general yes, if there is level playing field in all other countries worldwide

a company
Germany

production of fine chemicals on request - toll manufacturer for fine chemicals

No. Since the conditions are not mirrored in all countries in the world, it is not an instrument for fair trade.

a no profit organisation
Germany
trade union

The IG Bauen-Agrar-Umwelt (the German Trade Union for Construction, Agriculture, Forestry and the Environment) represents 320.000 workers in Germany. We consider that trade policy should target the improvement of working conditions, the environment the human rights situation in Europe and in the whole world. Quality of life of workers in Germany is depending on a stable international environment based on values such as democracy, the respect of human rights and sustainable development. Therefore we consider a scheme that aims to encourage other countries via trade preferences to improve the living conditions of their own population a legitimate instrument for development. We argue for a revised scheme that will give developing countries even higher incentives for a sustainable development.

other
Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

As a matter of principle, we hold the view that a multilateral elimination of all tariffs (including agricultural tariffs) within WTO would serve best for developing countries.

On the one side, all trading partners would enjoy duty-free access to the European market. Many developing and emerging countries have hard feelings especially about the difficultly accessible European agricultural market, because they are highly competitive in the agricultural sector.

On the other side - as historic experience shows - it would be in the very own interest of developing and emerging countries to open their markets: in the short- and medium-term this leads to the building up of own competitive industries, export orientation, and economic growth and prosperity. Therefore, unilateral tariff preferences should be granted only to truly needy countries - i.e. LDCs - who do not manage to integrate in the global economy by their own efforts.

Therefore, we believe that the special arrangement of EBA ("Everything but arms") is a useful instrument of development aid. By contrast, we think that it is counterproductive to grant - within the GSP - unilateral tariff preferences to high-income countries (e.g. Gulf States). Meanwhile, these countries are globally competitive with many products and no longer need the GSP. In the following we will come back again on this issue.

For many years, the chemical industry has been actively advocating an elimination of chemical tariffs worldwide under WTO. Especially emerging countries are vehemently opposing this proposal in Geneva. Moreover, granted preferences are used as a pretext for rejecting further liberalization ("erosion of preferences"). Thus the system of preferences results in a denial of the WTO's liberalization mandate.

In addition to this answer to Q1 and before entering into the questionnaire as a whole we would like to present our general position to the future GSP as follows: VCI Position on GSP Are autonomous preferential tariff measures still suitable as a modern instrument of the EU Development Policy?

I. The GSP as a development and trade policy instrument Since 1971 the European Union (EU) has been linking development policy goals with the trade policy instrument of unilateral tariff preferences for developing countries. This is done through the Generalised System of Preferences (GSP). This EU's own system wants to facilitate access for products from currently 176 developing countries, enabling them to more easily participate in the international market. Based on the GSP, beneficiary countries are granted - fully or partly - tariff-free access to the single market of the European Union. The existing GSP provides for the following tariff preferences: a. A general arrangement for unilateral tariff preferences for currently 176 beneficiary countries and more than 6200 tariff lines. b. A special arrangement as an incentive for sustainable development and good governance; the so-called GSP+ grants wider tariff preferences to beneficiary countries which fulfil certain criteria. In total, 14 countries meet GSP+ criteria. c. A special arrangement for least-developed countries (LDCs): the so-called 'Everything but arms' initiative. Currently 49 countries - identified by the World Bank as LDCs - enjoy tariff- and quota-free access to the European market. Tariff preferences want to reduce poverty in developing countries, trigger sustainable development and encourage good governance. This 'counterpart' of development aid was intended to benefit EU producers by enabling more favourable purchases of input materials from those countries. Details for the concrete shaping of the system and for adapting it to new developments are laid down in time-limited guidelines and regulations; most recently in Council Regulation (EC) No 732/2008, which will expire on 31 December 2011. This method identifies beneficiary countries, products covered by the system, and preference margins. Furthermore, it decides on the part-exclusion of individual countries from the GSP in a product-related approach, when competitiveness is achieved in the manufacture of certain products (so called graduation). As a matter of principle, the GSP makes no differentiation between developing and emerging countries. Many developing and emerging countries as well as numerous EU producers have benefitted from the GSP. However, major changes in worldwide economic structures are being observed as a result of globalization. Therefore, the question arises whether the GSP is in need of fundamental revision.

II. Changing economic situation for producers in beneficiary countries Now EU chemical producers are noting that developing countries and especially emerging countries have the prerequisite production know-how, adequate production plants and capital providers for concrete products from the chemical production range. Consequently, these countries are increasingly taking up a role as competitive suppliers of chemical products on the world market and can no longer be seen as 'in need of development', where these concrete products are concerned. Production in these countries is less costly than in the EU (labour and raw material costs) and frequently encouraged by subsidy-like measures ('dual pricing'). Additionally, the EU grants tariff preferences. One good example is polycarbonate. Large quantities of this plastic material are used in industrial production worldwide (global demand in 2008: ca. 3.000 kilotons), e.g. for compact discs, car headlights, packagings, displays and many more applications. European producers were leading in this field for a long time. But meanwhile the situation has changed fundamentally. Today some beneficiary countries are operating large chemical plants and building new ones. Existing plants and plants under construction meet the state-of-the-art; their products come up to the highest expectations. Furthermore, capacities of plants enable them to exceed by far the demand on local markets - with production being planned for world market requirements. Another interesting point is that investors favour beneficiary countries as locations for such plants, for strategic reasons. Conversely, many beneficiary countries charge high import tariffs on such products. In their efforts to succeed on the market, EU exporters might adapt pricing policies, which can rapidly bring them under the suspicion of dumping - with the danger of impacted beneficiary countries taking relevant protective measures. Thus we note increasing global competitiveness from beneficiary countries for certain fields of products on the one side, and disadvantages for European producers of the same products on the other. These 'home-grown' disadvantages for European producers cannot be reconciled with the goals of the Communication from the European Commission 'Global Europe - Competing in the world'¹, where the Commission advocates reciprocity in the opening of markets: _____¹ COM(2006) 567 final 'Our core argument is that rejection of protectionism at home must be accompanied by activism in creating open markets and fair conditions for trade abroad. This improves the global business environment and helps spur economic reform in other countries ... But most emerging countries combine high growth with unnecessarily high barriers to EU exports. As their role and the

benefits they draw from the global trading system grow, so too do their responsibilities to play a full part in maintaining a global regime that favours openness.' (cp. pages 5,6)

III. Impacts of the GSP on WTO negotiations and FTA negotiations For many years, the chemical industry has been actively advocating an elimination of chemical tariffs worldwide under WTO. Especially emerging countries are vehemently opposing this proposal in Geneva. Moreover, granted preferences are used as a pretext for rejecting further liberalization ('erosion of preferences'). Thus the system of preferences results in a denial of the WTO's liberalization mandate. The European Union is engaged in numerous negotiations with developing and emerging countries, with the aim of full tariff liberalization. Such free trade or economic partnership agreements are much appreciated alternatives to WTO. Unfortunately, it is noted that some negotiating partners of the EU see existing preferences as a matter of course and refuse to take reciprocal measures for contractually agreed tariff elimination. Here, the GSP adversely affects the EU's negotiating position.

IV. The key question: does the GSP still serve its purpose? From the chemical industry's viewpoint, it is today no longer possible to purposefully merge development and trade policy goals within a system which does not take into account changes in global trade. If the goal is, on the one hand, to lastingly ensure the EU's future as an industry location whilst simultaneously strengthening the competitiveness of European industry and, on the other hand, the goal of full tariff liberalization is to be really achieved, there is no room left for the GSP in its present form. The EU must get ready for this new situation and set the course for the future as soon as possible.

V. Future of the GSP The existing GSP is based, inter alia, on the following three principles: - A generous tariff offer (Regulation (EC) No 732/2008)), - orientation to the neediest countries, - transparent graduation with a stronger focus on the most important beneficiaries. 1. Selection of GSP beneficiaries (Article 3) According to Article 3 of the existing Regulation, a beneficiary country is removed from the scheme a. when it has been classified by the World Bank as a high-income country during three consecutive years, AND b. when the value of imports for the five largest sections of its imports covered by the GSP into the Community represents less than 75% of the total GSP-covered imports from the beneficiary country into the Community ('diversification criterion'). We believe that the above criteria are in need of fundamental revision. First of all, a beneficiary country should be removed from the scheme as soon as it has been classified by the World Bank as a high-income economy - and not only after an observation period of three years. This step should be taken irrespective of the country's export structure. For example, today all Gulf countries are GSP beneficiaries. But according to the World Bank, they are high-income economies and their gross national income per capita exceeds that of some EU member states. Moreover, the diversification criterion can bring arbitrary and random results, because only GSP-covered exports - and not total exports - of a country are analyzed. A country can have a highly diversified export structure, where possibly only exports under GSP are not diversified. Consequently, this criterion might give a very wrong picture of a country's export structure. In order to realistically reflect the export structure of a country, the diversification criterion should examine its total exports and not only exports covered by the GSP. In the long term, abolishing the GSP should be considered. We think that the special arrangement of 'Everything but arms' (EBA) sufficiently ensures support for really needy countries. 2. Removal of tariff preferences for products (Article 13) We ask to create a fundamental balance between the development-political offer of the EU to beneficiary countries and the preservation of a level playing field for competitive companies from beneficiary countries and from the EU alike. In plain words: products, which are offered at competitive conditions on the international market, should no longer enjoy GSP preferences - with this step to be taken in a timely manner. New yardsticks for observation and action should apply, also taking into account the breathtaking speed in the development and spreading of new technologies, the following concept and planning phase for production plants or entire industry locations and, finally, the market entry of products. Today this sequence of events happens within such short periods of time that a removal of tariff preferences under existing rules of Article 13 of the GSP Regulation can no longer prevent damage to EU producers. For this reason, too, observation periods need to be shortened decisively. Graduation, which is based on the removal of tariff preferences for all products of an entire section, is no longer adequate today. The GSP concept should include the fact that not the products of one section

as a whole but selected, individual products of one industry enable emerging countries to competitively participate in international market activities. Consequently, there must be the possibility to individually remove tariff preferences for such competitive products.

VI. Conclusion Against the backdrop of globalization - which brings fundamental changes in the international division of labour and in global supply chains - the Generalised System of Preferences (GSP) no longer reflects the present-day situation. In the long term, the GSP should be replaced by binding agreements on multilateral or bilateral tariff elimination. The existing GSP is rather an obstacle in relevant negotiations, because trading partners either oppose liberalization ('erosion of preferences') or they offer no concessions (FTA negotiations). Moreover, the GSP does not sufficiently take into account the increased competitiveness of emerging countries. The goal of maintaining and enhancing the competitiveness of local industry, which ranks among the stated goals of the European Union, is in danger due to overly rigid adaptation rules of the GSP.

The German chemical industry advocates a fundamental revision of the Generalised System of Preferences and an abolition of this system for industrial products in the long term. This revision should focus on the competitiveness of local industry. The EU should conclude free trade agreements with emerging countries, with both parties committing themselves to contractually binding tariff elimination and provisions on other trade issues. The least-developed countries (LDCs) should continue to benefit from the development-promoting elements of the GSP, in particular from the special arrangement 'Everything but arms'.

VII. Summary and recommendations — In the Communication of 2006 'Global Europe - Competing in the world' the Commission criticizes 'unnecessarily high barriers to EU exports' in emerging countries and calls upon emerging countries to face up to their responsibilities in the global trading regime. — The GSP no longer adequately addresses present-day global economic conditions and should be completely abolished for industrial products in the long term. — In the medium term, the EU should conclude free trade agreements with all emerging countries, enabling European industry to benefit from free trade with these countries. — The European Union should continue to grant preferences to the least-developed countries (e.g. through the 'Everything but arms' initiative). — In the short term, the following measures should be taken: o Enable the graduation of individual products. o Remove high-income economies without delay from the GSP scheme.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

Yes, particularly the special incentive arrangement for sustainable development and good governance (GSP+) From the perspective of the processing and trading sector of fisheries and aquaculture products, GSP + has been key to revive the economy of the GSP+ beneficiary countries. Also, the EU processing and trading sector of fisheries and aquaculture products has made several investments in processing activities in GSP+ beneficiary countries benefitting from this regime and thereby contributing to their socio-economic development and ensuring the supply for the EU industry. Thus, to ensure the stability and continuity of the activity generated under this trade regime, to maintain the GSP+ is vital, ensuring duty - free access to the EU market for fishery and aquaculture products. Furthermore, its current beneficiary countries should continue to be it in the successor regulation.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

Yes, particularly the special incentive arrangement for sustainable development and good governance (GSP+) From the perspective of the processing and trading sector of fisheries and aquaculture products, GSP + has been key to revive the economy of the GSP+ beneficiary countries. Also, the EU processing and trading sector of fisheries and aquaculture products has made several investments in processing activities in GSP+ beneficiary countries benefitting from

this regime and thereby contributing to their socio-economic development and ensuring the supply for the EU industry. Thus, to ensure the stability and continuity of the activity generated under this trade regime, to maintain the GSP+ is vital, ensuring duty - free access to the EU market for fishery and aquaculture products. Furthermore, its current beneficiary countries should continue to be it in the successor regulation.

a no profit organisation

India

Research in International Economic Relations

Yes, it is an important instrument for development and should be continued.

other

India

Teaching and Research ---- Reader in Economics

Yes, because, it leads to social equalization.

other

India

Higher Education ---- An Academic in a Central University, under the HRD Ministry, Government of India

The nature and profile of the trade from Developing countries has drastically changed during the last two decades. It may still be a valid tool for LDCs, but for developing countries like India, its relevance has diminished. Its commodity composition also needs to be reviewed. The introduction of variants like the Super GSP, according to me defeats the very purpose of the mechanism. It may even be argued that the commodity composition of GSP may even prevent many developing countries from altering their present production patterns

a no profit organisation

Italy

Education and Research

Yes. It should be continued

a no profit organisation

Italy

Research and Education

Yes. I do think so.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

Yes. Liberalization is always a good instrument to stimulate development. Much more so than foreign aid.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

Yes, GSP substantially contributes to the development and should be continued, however in a more targeted manner towards the most vulnerable countries.

a company

Malaysia

Textile

Yes

a company

Malaysia

Export Pepper

Yes

a company
Malaysia
Garments
Yes

a company
Malaysia
Screw, Nut & Washer
Yes

a company
Malaysia
Manufacturing
Should be continued

a company
Malaysia
Export
Yes, it should be continue as it provide tax relieve for importers.

a company
Malaysia
Manufacturer of furniture
Yes. of course. This will help our EU customers by reducing the import duty and encourage them to buy it directly from us.

a company
malaysia
manufacturer of hydraulic rubber hoses
GSP is a valid instrument of development & yes it should be continued.

a company
Malaysia
Screw fastener manufacturer
Yes

a company
Malaysia
Manufacturing
Yes, GSP is a valid instrument for export of Malaysian products into EU countries and should be continued.

a company
Malaysia
Manufacturer
Yes

other
Malaysia
International trade and industry ---- Ministry of International Trade and Industry Malaysia
Yes. GSP is a valid instrument for development and should be continued.

other
Mauritius
International Trade ---- Government official
Yes, the way the GSP is being applied should be reviewed

a business association
Myanmar
Garment and Apparel Manufacturing

GSP is indeed a valid trade instrument for development. It is clearly seen in the case of Myanmar that by imposing economic and GSP sanctions, it suffers severe consequences, effecting heavily on the people of Myanmar, especially those of the grassroot levels, the group that has the potential to emerge as a middle class when given opportunities and supports, who can then take a major role in the country's development.

a business association

Myanmar

Association

Yes, GSP is a valid trade instrument for development, which aims at reduction of poverty and sustainable development and good governance. It should be continued. But, at the same time, the fact that removal of GSP can result in severe consequences that can create serious unintended effect on the countries subject to withdrawal, should not be neglected. As in the case of Myanmar, the damage has already been done, but there is still time to change and help the country. Since EU is conducting a global review of GSP, I ask to review this counterproductive sanction.

a citizen

Myanmar

observer

yes, i agree

a company

Myanmar

Information Supply

Yes, because Myanmar as a low developing country has suffered from not getting GSP, especially the garment sector in which customers from the EU are deterred from company. The motto Trade not AID is the only solution in being able to let countries develop with their own resource and thus achieve sustainable economic development especially for the poor.

other

Panamá

Servicio ---- Ministerio de Comercio e Industria de Panamá

Para Panamá el SGP es un instrumento de política comercial válido para incentivar el desarrollo de países cuyo comercio no es competitivo frente a economías más desarrolladas. Esta instauración de preferencias debe ser continuado, toda vez, que representa un gran beneficio al permitir que el país realce su participación en el movimiento comercial hacia esta área económica de gran importancia para el comercio mundial.

a business association

Paraguay

National development of the Export sector

Yes, it adds competitiveness for exporters of developing countries.

a company

Paraguay

oilseeds processing

It is valid instrument as long as it is promptly available and avoiding useless steps.

a company

Paraguay

Sugar and Alcohol

Yes, if it is possible, add new products to the list.

a company

Paraguay

manufacture of lumber

Yes.

a company

Philippines
manufacturer and exporter of home & garden decors
Yes.

a company
Philippines
Manufacturing of packaging products
Yes

a company
Philippines
Agriculture and Aquaculture
Yes if it can support the business

a business association
Portugal
Textile and Clothing Industry

a company
Qatar
manufacturing
yes, we agree that it should be continued.

a company
Qatar
Liquified Natural Gas
No comment.

a company
Qatar
Chemicals and Petrochemicals
Yes, given the proper oversight it should provide developing countries access to EU markets.

a citizen
Republic of Macedonia
Customs
Yes

a business association
Spain
Fisheries
Yes, we do, since it enables duty-free raw material to enter the EU.

a citizen
St Vincent & the Grenadines
ICT 4 Development and trade in Services
Yes

a business association
Sweden
The Association of Swedish Chambers of Commerce representing Swedish companies. The Swedish Chambers of Commerce are regional, independent, non-profit making organizations, funded by the members.
Yes. However, we believe that the GSP would be a more efficient tool for development if rules of origin were less complicated and more transparent. Moreover since the EU excludes or reduces the preferences for "sensitive products" the system is slow to adjust to the market needs of developing countries. These exclusions should be up for re-evaluation on a continuous basis. To be efficient, especially the EBA has to be paired with technical assistance to developing countries, building capacity to take part in global trade and benefit from the GSP.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q1. GSP has worked much worse than intended. (At least one can hope it was intended to work better, but with EU trade policies one can never be sure). Alternative policies, like lowering of mfn tariff rates could well have resulted in better fulfilment of the goals set up for GSP. We want to point out already here on this point that the GSP system, the GSP and the origin rules that goes with it, in the sense that it doesn't create the amount of trade necessary to foster economic growth in poor developing countries, especially not in Africa. If it is not working for LDC:s what is for?

The GSP has to focus only at growth in really poor countries and to that end the origin regulations has to be: a single transformation rule together with 0 duties on everything legally made in developing countries with lesser risk than today for importers to use the system. Remember well that importers role is to use the system and by doing so fulfil the goals of the GSP. Importers do not need GSP.

GSP needs importers. Importers really only want clear and strait rules in a trade system not giving any competitive advantage for anyone before anyone else. If the system is mended and totally directed towards economic growth in poor developing countries it might be saved and worth while to keep. The way it is used now, forcing one of the countries, Sri Lanka, most in need to use it, out of the system, is a disgrace so grave that it sets the whole system into question. But you haven't noticed have you?

a no profit organisation

Sweden

RFSL, The Swdsh Federation for Lesbian, Gay, Bisexual and Transgender Rights, is the main LGBT-organisation i Sweden with 29 branches all over the country, working with LGBT rights, LGBT health, operating counselling services, arranging social and cultural activities, working with education, facilitating international projects in cooperation with other stakeholders etc. RFSL is a member of ILGA - International Lesbian, Gay, Bisexual and Transgender Association.

It would become an even more valid instrument for development if GSP+ countries faced additional demands on respect for human rights including the human rights for lesbian, gay, bisexual and transgender persons. See answer upon question 23.

other

Switzerland

Policy research and negotiation assistance ---- International organization

Yes, it embodies the principle of Special and Differential Treatment established since the 60s in international trade law. Including too many conditionalities could shift the balance of commitments towards the supposed beneficiaries which would not answer the objective of Special and Differential Treatment

other

Syrian Arab Republic

Customs ---- Government sector

Yes I do.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

Yes. The GSP provides duty-free tariff treatment for selected products imported from designated developing countries to promote their economic growth by making their exports more competitive. It is not only a valid trade instrument for development, but it also provides real economic value to Thailand and helps Thailand to integrate itself into the world trading system. Moreover, the rules of origin under the GSP schemes of preference-giving countries allow Thailand to promote the utilization of domestic materials in the production in order to comply with the rules of origin requirements.

The preferential access provided by the GSP scheme is important particularly for Thailand since Thai economy is export-dependent and has relied heavily on resilient export to drive growth.

Thailand's export sector accounting for about 60 per cent of its GDP suffered from the emerging global economic crisis as a result of falling global demand in 2008. Total exports continued to decline by 23 per cent in the first quarter of 2009 due to the country's dependence on the economies of Europe, the United and Japan.

Thus the GSP scheme will remain an effective tool in helping Thailand to improve its export performance via the preferential access to the EU market.

Another reason for the necessity of GSP is that Thailand is still limited by factors of productions such as technology, capital investment and economies of scales. These factors restrict Thailand's production capacity and ability to compete in a global market. Furthermore, the normally high import tariff is a main difficulty for Thai products to compete in international markets.

This is especially the case for SMEs, which form the majority of Thailand's industrial firms contributing greatly to the country's economic growth. Thai SMEs are not in the position to compete with multinational firms and are facing a number of obstacles such as fundamental lack of resources and ability to compete with multinational firms, limited market access, lack of R&D, technology capacity and exporting knowledge.

It is essential to create a level of playing field for the SMEs to allow them to promote development and to achieve sustainable growth. The preferential market access will give the SMEs the opportunities to integrate themselves into the international markets which will greatly generate jobs and income for Thai people in Northern and Northeastern regions in particular. The GSP has also encouraged and enabled Thailand to diversify its industrial sectors. As it appears, Thailand's increasingly diversified manufacturing sector is the largest contribution to growth. The industries registering rapid increases in production included computers and electronics, furniture, wood products, canned food, toys, and plastic products. In addition, the existing GSP scheme has enabled Thailand to promote its products which yields more investments, employment and economic development of the country as a whole.

In 2009 FDI inflows from EU valued at US\$ 691.55 millions, an increased of 19% from 2008 which had a value of US\$582.50 millions. The industries that are the main recipients of these FDI inflows included electronics, chemicals, plastics, metal, machinery, agricultural and processed agricultural industries. These increase in FDI results in an increase in capital accumulation and therefore the development of Thai manufacturing industries. For instance, trade and FDI have played a key role in building up Thailand's electronics industry, in particular, by facilitating inflows of capital and technology.

The electrical appliance and electronics industry is a main driver of the export sector accounting for 30 per cent of Thailand's outbound shipments. Overall Thailand's export of electrical appliances reached US\$17.6 billion in 2008, 16.6 per cent of which went to the EU market, almost twice as much of the outbound shipments in 2002 which totaled just US\$9.7 billion. On the other hand, as a result of the economic impact of the global recession and the decline in global demand, Thai exports declined by 23 per cent in the first quarter of 2009, due to Thailand's dependence on the economies of its main markets - the United States, the European Union and Japan. Thailand's industrial production fell sharply as exports dived.

Several major manufacturing industries dropped by 11.4 per cent with motor vehicles fell a precipitous 40 per cent. Consequently, GDP contracted by a steep 5.9 per cent and by a further 1.8 per cent in the first quarter of 2009 causing private consumption to fall by 2.4 per cent year-on-year in the first half of 2009 as a consequence of a weakening labor market, a fall in export prices of agricultural commodities and the industrial production. Furthermore, the employers responded to the plunge in export orders and subsequent weakness in domestic demand by reducing working hours and employment contributing to an increase in the unemployment rate to 2.1 per cent from 1.3 per cent in the preceding quarter.

Moreover, Thailand's recent domestic political impasse has aggravated and weakened Thailand's economic growth, eroded investors and consumer's confidence. Internally, Thailand's persistent political uncertainty has disrupted policy-making and delayed disbursement of budget spending and the public investment programme.

The private sector, SMEs in particular, has been weakened by both the global recession and the political uncertainty. Political instability has had a significant negative impact on the economic prospects of Thailand. What Thailand needs now is urgent reforms to improve its productivity, enhance competitiveness and to promote more equitable growth in both the capital city of Bangkok which has become the centre of economic activity and the most prosperous part of the country accounting for about 60 per cent of national GDP, and the rural areas. In the long run, a return to high growth in Thailand will require, among others, developing additional sources of

external demand, boosting its domestic consumption and regaining the foreign investors' confidence.

In addition to Thailand's domestic reforms and the continuation of the preferential treatment granted by the EU GSP scheme will help Thailand in restoring its growth and development to the country and ensure stability and predictability for investors, consumers and traders in both the EU and Thailand. Thus, the EU GSP is a necessary and vital tool to assist Thailand to restore and continue to develop and hence accelerate growth in the country.

a citizen
uganda
data clerk
yes

a citizen
UK
Private
Yes

a citizen
UK
Construction

Yes but countries who blatantly ignore humanitarian standards (like Sri Lanka) this should be stopped

a citizen
UK
Economic research

Yes, a legal instrument under trade law. Yes it should be continued because removing it would damage those currently receiving preferences and would be against EU members' commitments in the WTO. It is not a particularly well targeted development tool so the ultimate objective should be to phase it out in favour of better ones.

a company
UK
Import and Distribution

yes. Without them, developed or more sophisticated economic regions have too much of an advantage. If a country benefits from GSP then it attracts investment which encourages industrial development that leads to more efficient practises within that country's industry. In short, this speeds up the economic development process and enables the country to benefit socially as a result.

a no profit organisation
UK
Development Education, campaigns + advocacy

Trade, probably more than any other instrument, has the potential to reduce poverty in the developing countries (DCs). The EU GSP system, and particularly EBA, is therefore welcome. We believe that the goal and guiding principle of EU trade policy should be to give full market access to less advantaged, poorer countries. This should not be seen as a 'concession': as long as OECD countries, including the EU, continue to pour public resources into their agricultural sector, DCs, who in general rely heavily on that sector, are put at a disadvantage. But there are also pragmatic benefits: given the amount of investment flowing from China to Africa, for instance, it would be in the EU's own interests to maintain good trading partnerships with African countries.

other
UK

Multi sector trade union - public services, manufacturing and commercial services ---- trade union
The EU's GSP system has always had the potential to be an important instrument of EU trade policy in assisting developing countries to gain more revenue and growth from trade with incentive structures linking this to the promotion of sustainable development and good

governance. Its success in achieving this will always hinge on ensuring compliance with the conditions of the trade status, which as we mention below, has not been guaranteed by the EU Commission in the past and needs improvement.

Trade unions have long argued that the GSP system should award trade preferences to those developing countries that show genuine commitment to the rights and protections and well-being of their workforce and citizens generally. Countries should not be able to build competitive advantage by abusing workers' and human rights.

Good governance in labour- and human rights built on the implementation and respect for labour standards, can enable developing countries benefit from international trade, and critically, ensure that those gains are equitably shared to develop sustainable economic and social prosperity and lift more people out of poverty. As G20 nations recognise, respect for core labour standards, along with the other pillars of the ILO's Decent Work Agenda, are central to promoting global sustainable and equitable economic recovery.

GMB supports the continuation of this trade instrument with the condition that the EU Commission provides stronger and more effective measures to uphold the principles mentioned above.

a business association
United Kingdom
Seafood importation
No comment

a no profit organisation
United Kingdom
animal welfare
yes

a no profit organisation
United Kingdom
Representing workers in all sectors in the UK

The Trades Union Congress (TUC) represents 59 trade unions in the UK, covering 6.3 million workers. It is a member of the European Trade Union Confederation (ETUC).

The TUC welcomes the opportunity to respond to areas of specific interest to us in the public consultation on the proposed revision of the European Union Regulation on the Generalised System of Preferences (GSP). We reserve the right to expand on this response in the light of the discussions that will take place around the Commission proposals.

The EU's GSP system is an important instrument of EU trade policy in assisting developing countries to gain more revenue and growth from trade, and through its incentive structures, to link this with the promotion of sustainable development and good governance.

Trade unions have long argued that the GSP system should award trade preferences to those developing countries that are genuinely interested in the well-being of their workforce. And relatedly, countries should not be able to build an artificial competitive advantage by abusing workers' rights.

Secondly, well-functioning labour market institutions, built on respect for core labour standards, can enable developing countries to capture fair gains from international trade, and critically, ensure that those gains are equitably shared. As G20 nations recognise, respect for core labour standards, along with the other pillars of the ILO's Decent Work Agenda, are central to promoting global sustainable and equitable economic recovery.

The GSP regulations evolved in 2005 to provide a clear linkage between respect for the ILO's Core Labour Standards and trade preferences, resulting in some success. Several countries have ratified ILO core conventions in order to be eligible for additional trade preferences. Further, since Belarus was suspended from the GSP in 2007 for violating labour standards it has taken some steps to improve its implementation in the hope of rejoining the system.

However, in general the impact of the system on actual improvement of labour standards is much less clear, especially given the scheme's lack of transparency and benchmarks to measure progress by. Further, the general trend of preference erosion and the low take-up of the GSP+ component threaten the scheme's long term effectiveness.

To improve the effectiveness of the scheme to deliver on its objectives, and ensure the confidence of working people globally, the revised GSP regulation should have (consultation questions in brackets): clearer definitions and benchmarks of effective implementation and for

the temporary withdrawal provisions (see questions 20, 27, 28, 32); stronger and more transparent processes for monitoring compliance, conducting investigations and assessing applications (questions 20, 26); better incentives and more targeted technical assistance to help developing countries drive improvements in implementation (Question 20); clearer and more consultative procedures for filing a complaint, commencing an investigation, approving applications, and readmitting countries to the scheme (including role of the European Parliament) (see questions 33); and clearer and improved role for social partners in monitoring compliance and triggering investigations (questions 26, 33).

a business association

URUGUAY

CITRUS EXPORTS, SPECIALLY TO THE EU

YES- Any instrument which gives support for the sustainable development of developing countries is positive, taking into account that the supplier fulfills all other legal requirements and rules are equivalent for all suppliers for a certain product.

a company

Uruguay

Tanned sheepskins and garments.

Yes

a company

Uruguay

Exportacion de Miel , Cera y Propoleos organico y convencional

Si , es una herramienta fundamental que abre camino a nuevos mercados y proporciona mas variedad de oportunidades

other

Vietnam

government official ---- government official

yes

Q2: Do you consider that the stated current objectives of the EU GSP to contribute to the reduction of poverty in developing countries by generating revenue through international trade and giving support to sustainable development and good governance - as set out in the Commission Communication of 2004 and reflected in the current GSP Regulation 732/2008 - remain valid? If not, how should they be modified?

a no profit organisation

Argentina

Export services

The stated current objectives of the EU GSP remain valid and in force.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Si, consideramos que los objetivos enunciados continúan siendo válidos. Aún así entendemos necesario realizar algunos ajustes al régimen actual en pos de reasegurar la consecución de los objetivos perseguidos.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Die erwähnten Ziele habe ohne Zweifel weiterhin ihre Bedeutung, wenngleich neben diesen in gleicher Weise auch die Auswirkungen dieser Importe auf die Gemeinschaftsindustrie

berücksichtigt werden müssen. Das APS sollte sich verstärkt auf tatsächlich unterentwickelte Länder konzentrieren und höher entwickelte Schwellenländer aus dem Begünstigungssystem entlassen. das derzeitige System begünstigt teilweise höher entwickelte Länder, die diese Unterstützung nicht mehr oder nicht mehr im selben Umfang benötigen (zB Brasilien, Indien.....)

a no profit organisation

Austria

trade policy

Given the depth of the global financial crisis, and the terrible impact it has had on some of world's poorest workers, the sustainable development objectives of the GSP scheme are more valid than ever. Firstly, the crisis has caused a large contraction in world trade that has hurt some of the poorest exporting countries.

The market access provided by GSP to developing country exporters is making an important contribution to economic recovery in these countries. Secondly, as ILO research has recently concluded, countries maintaining strong systems of social protection, and respect for core labour standards have weathered the crisis best.

The GSP system can play an even better role. Accordingly, the revised regulations should reflect the central importance of both Core Labour Standards, and the broader concept of the Decent Work Agenda in its preamble. In particular, it should refer to the 2008 ILO Declaration on Social Justice for a Fair Glo-balization - the definitive statement of the Decent Work Agenda, endorsed at the highest levels of the international system. Secondly, it should refer to the ILO's 2009 Global Jobs Pact.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

I AM CONFIDENT THAT THIS CONTRIBUTES TO THE REDUCTION OF POVERTY IN THE DEVELOPING NATIONS. I FEEL THE CERTIFICATE ORIGIN NEEDS TO BE MADE LESS STRINGENT

a business association

Belgium

International trade in flowers

As with other EU trade preferential regimes (i.e. duty concessions in the floriculture sector granted to Kenya under the Lome / Cotonou Conventions and later the EPAs), Union Fleurs believes that the EU GSP remains a suitable instrument to alleviate poverty in developing countries. Through its preferential concessions it contributes to create a "trade not aid" situation which it is key to the remarkable growth in these regions.

a business association

Belgium

Renewable energies

GSP tariff preferences for biodiesel benefit almost exclusively three developing countries benefiting from GSP tariff preferences: Argentina, Indonesia and Malaysia. The table below shows that 1.1 million tons out of the 1.7 million tons total EU biodiesel imports (two thirds) of the EU biodiesel imports over the year 2009 originated from Argentina, Indonesia and Malaysia. These three countries are covered by the GSP general scheme .

This trend continued in the end of 2009, when EU imports were almost exclusively (83%) originating from developing countries: Argentina, Indonesia and Malaysia. GSP tariff preferences support the main biodiesel exporters to the EU, which are perfectly mature and competitive on the EU market due to a price advantage on feedstock, reflected in the biodiesel price, ranging from 14% to 18%.

Against this background, it is difficult to justify continued GSP tariff preferences artificially adding to the competitive advantage of Argentina, Indonesia and Malaysia, when the EU industry has not been given the chance to recover from the unfair competition from the subsidized and dumped US biodiesel.

Therefore, EBB respectfully recommends the reintroduction of the MFN tariff for biodiesel (tariff code 3824.90.91) for beneficiaries of the GSP general scheme. The suggested legislative changes are described in EBB position ref. 472/TRA/10 sent to TRADE-GSP-Consultation@ec.europa.eu last June 2nd, 2010.

a business association

BELGIUM

NITROGEN FERTILIZERS

Yes GSP tariff concessions should be conditional upon respect for sustainable development and good governance. We support the "linkages" to ILO rights, human rights, environmental standards and do wish to see a linkage made to climate change commitments - especially when a international binding treaty is agreed.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

The current objectives remain valid. However, broader trade policy objectives for example undistorted access to raw materials and the protection and enforcement of Intellectual Property Rights (IPR) should also be addressed in the GSP.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

The objectives remain valid but the practice shows that these objectives are not met. Welfare is not spread around the world to the same extent and those countries which are the poorest did not really change their status.

a business association

Belgium

Wood products

GSP should be developed more towards the least developed countries. For the wood products, e.g. the industry is well developed in Russia. GSP treatment to Russia is creating difficulties for wood industries in the EU, even more since Russia applies high tariff duties for EU products. Important products lines are e.g. plywood, LVL, parquet and sawn timber products.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

The objectives are still valid and development through trade should remain a cornerstone of the EU's development policy, while promoting good governance and sustainability. FESI also believes that when evaluating sustainability that the following should also be considered: The GSP should have the purpose of stimulating the manufacture of products for which there is domestic demand in the GSP beneficiary country itself. Indeed, the GSP should be about sustainable development and not about increasing economic dependence on exports whereby cost advantages are used and local production is abandoned when these cost advantages are exhausted.

a business association

Belgium

Trade association: Man-made fibres

Yes but with substantial modifications in terms of country coverage and rules of origin

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

The current objectives remain valid. However, it should be made clearer that these objectives can only be pursued with partner countries that abide by a rule-based system and operate in a framework that is truly conducive to the creation of welfare, sustainable development and good governance.

a business association

Belgium

Textiles & Clothing

Further efforts should be displayed in ensuring an effective accomplishment of the GSP objectives. The current regime still favours a limited number of countries which in some cases have high GDP growth rates and are considered to be strong emerging economies (eg. India, Brazil). The concentration of the GSP benefits in certain countries is clearly undermining the core objectives of the instrument.

a business association

Belgium

EUROCHAMBRES, the Brussels-based Association of European Chambers of Commerce and Industry EUROCHAMBRES is the sole European body that serves the interests of every sector and every size of European business and the only one so close to business. EUROCHAMBRES has member organizations in 45 countries representing a network of 1,700 regional and local Chambers with over 19.8 million member companies. Chamber members employ over 120 million employees.

We believe that one of the most important means for poverty reduction is through the economic growth created by international trade and investment. Thus the objectives remain valid.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

Yes, of course. As mentioned above (Q1), without the GSP and the advantage of duty free import the attractiveness of imports from countries like Bangladesh would decrease. Obviously, without placing orders in such countries, European importers are not in the position to monitor and to improve the social performance of their suppliers, as illustrated by the example provided by a company member of EuroCommerce: "E.g. today we have audited the social performance of all our textile suppliers in developed and less developed countries around the world. Those suppliers who did not fulfil our requested standard were supported by us with training and qualification measures in order to improve their performance and to fulfil our standard. Without the current order placing we are not in the position to improve our suppliers' performance."

a business association

Belgium

Representing the foreign trade interests of European retail trade

Yes, as part of the EU development policy

a citizen

Belgium

Finance

Yes

a company

Belgium

Import of food items

Not really as it is very difficult / almost impossible to prove on an objective basis that poverty has been / is really reduced to the benefit of the whole population of such countries. It will be most probably on the contrary : local (mostly funded by multinational monopolistic companies) industry will be to the detriment of the local population as well as availability is concerned, as working and living conditions, etc

a no profit organisation

Belgium

Development NGO

Yes

a no profit organisation

Belgium

Agricultural and Agrifood Trade

No comment

a no profit organisation
Belgium
Economic justice

Development through trade can be achieved only if a series of other conditions are in place: these conditions include inter alia access to technology, which must not be hindered by stringent intellectual property rights, the possibility to protect the local agricultural sector and the local infant industry from the influx of cheap goods from developed countries, the preservation of a strong public sector capable of investing in education, health, transport.

a no profit organisation
Belgium
trade union

Given the depth of the global financial crisis, and the terrible impact it has had on some of world's poorest workers, the sustainable development objectives of the GSP scheme are more valid than ever. Firstly, the crisis has caused a large contraction in world trade that has hurt some of the poorest exporting countries. The market access provided by GSP to developing country exporters is making an important contribution to economic recovery in these countries. Secondly, as ILO research has recently concluded, countries maintaining strong systems of social protection, and respect for core labour standards have weathered the crisis best. The GSP system can play an even better role. Accordingly, the revised regulations should reflect the central importance of both Core Labour Standards, and the broader concept of the Decent Work Agenda in its preamble. In particular, it should refer to the 2008 ILO Declaration on Social Justice for a Fair Globalization - the definitive statement of the Decent Work Agenda, endorsed at the highest levels of the international system. Secondly, it should refer to the ILO's 2009 Global Jobs Pact.

a no profit organisation
Belgium
trade
Yes

other
Belgium
Representing working people in all sectors throughout Europe ---- European Trade Union Confederation

Given the depth of the global financial crisis and the terrible impact it has had on some of world's poorest workers, the sustainable development objectives of the GSP scheme are more valid than ever. Firstly, the crisis has caused a large contraction in world trade that has hurt some of the poorest exporting countries. The market access provided by GSP to developing country exporters is making an important contribution to economic recovery in these countries. Secondly, as ILO research has recently concluded, countries maintaining strong systems of social protection, and respect for core labour standards have weathered the crisis best. The GSP system can play an even better role. Accordingly, the revised regulations should reflect the central importance of both Core Labour Standards, and the broader concept of the Decent Work Agenda in its preamble. In particular, it should refer to the 2008 ILO Declaration on Social Justice for a Fair Globalization - the definitive statement of the Decent Work Agenda, endorsed at the highest levels of the international system. In addition, it should refer to the ILO's 2009 Global Jobs Pact.

other
Belgium
Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)
Given the depth of the global financial crisis and the terrible impact it has had on some of the world's poorest workers, the sustainable development objectives of the GSP scheme are more valid than ever. Firstly, the crisis has caused a large contraction in world trade that has hurt some of the poorest exporting countries. The market access provided by GSP to developing country exporters is making an important contribution to economic recovery in these countries. Secondly, as ILO research has recently concluded, countries maintaining strong systems of social protection, and respect for core labour standards have weathered the crisis best. The GSP system can play an even better role. Accordingly, the revised regulations should reflect the

central importance of both Core Labour Standards, and the broader concept of the Decent Work Agenda in its preamble. In particular, it should refer to the 2008 ILO Declaration on Social Justice for a Fair Globalization - the definitive statement of the Decent Work Agenda, endorsed at the highest levels of the international system. In addition, it should refer to the ILO's 2009 Global Jobs Pact.

other

Belgium

advising our members, interest representation ---- Cefic

Yes, the objectives of the GSP - namely reducing poverty, supporting sustainable development and good governance - continue to be valid. Therefore, this instrument should focus on really poor countries (LDCs).

a no profit organisation

Belgium, Brussels

leather sector. COTANCE represents interests of National Associations of Tanners and Dressers

The objectives are still valid but need to be improved by: integrating new parameters where the implementation of trade-restricting measures leads to exclusion of benefits for specific products and countries; e.g. export taxes and export restrictions on raw materials (which today escape WTO scrutiny and sanctions but are widely recognised to cause significant harm to trade).

a no profit organisation

Bolivia

Exportaciones

Consideramos que si bien los objetivos actuales apoyan a desarrollo de nuestros países, se debería ampliar la posibilidad de ampliar los productos con preferencias dentro del SGP y SGP+. También se debe buscar la flexibilización de las normas de origen.

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

Bolivia and other developing countries need the tariff preferences granted by the GSP so its value-added products can be competitive in the European market. Without the GSP, only raw materials could reach EU market, which do not contribute to the development and employment generation.

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

Los objetivos actuales contribuyen a la reducción de la pobreza, consideramos que se lograrían mayores y mejores resultados si se amplía el número de productos tanto para el SGP como para el SGP+ y flexibilizar las normas de origen para acceder al mercado europeo.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

Developing countries need the tariff preferences granted by the GSP so its value-added products can be competitive in the European market. Without the GSP, only raw materials, which do not contribute to the development, would enter to the market

a no profit organisation

Bolivia

industry

They are valid but as anything could be improved, for instance we agree with the concepts and ideas explained in the 2004 communication of the Commission regarding the objectives, the increase of the non sensitive number of products, the simpler and single criterion to graduate products and the flexibility of rules of origin that would allow poor countries to enhance their capabilities and export volumes with added value to the European market.

other
BOLIVIA
EXPORTS ---- Government representative
YES

other
Bolivia
Government ---- Government Official

2. The objective of the EU GSP to contribute to the reduction of poverty remains valid, because through the encouragement of international trade it has been possible to help producers from developing countries and at the same time reward those countries that have demonstrated their compliance with the relevant conventions. However, in order for the GSP to contribute to this achievement it is necessary to pay attention to cooperation in this area and to seek ways to help governments take advantage of the tax preferences. This need could be reflected in the new Regulation, as far as it would be possible to do so.

other
Bolivia
Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio
Consideramos que si bien los objetivos actuales apoyan al desarrollo de nuestros países, se deberá analizar la posibilidad de ampliar los productos con preferencia dentro del SGP y SGP Plus. También se debe buscar la flexibilización de las normas de origen.

a business association
Brazil
industrial sector
Yes. Through the increment of international trade, the comparative advantages of developing countries are intensified not only in the sector benefited but also in the correlated areas, promoting benefits in the country economy as a whole.

other
Brazil
Government ---- Ministry of External Relations - Federative Republic of Brazil
We consider that an evaluation of the objectives of the EU GSP implies analyzing how the EU GSP define such concepts in the GSP provisions - for example, developing countries to be targeted, specific trade lines to be included in such system, sustainable development, and good governance. In our view, the EU GSP does not present a clear justification of why some criteria were chosen for selecting developing countries which will benefit from the trade preferences, and not others. There is no international basis for the application of concepts such as sustainable development or good governance as conditions for preference granting. The Appellate Body Report of the WTO in case "EC - Conditions for the granting of tariff preferences to developing countries" does not refer to either concepts, but to "development, financial and trade needs" of developing countries.

a company
Cambodia
Export
Yes, I do.

other
Colombia
Tourism and Trade (Import-Export) ---- Government of Colombia
Colombia considers that the current GSP objectives for the EU made to contribute to poverty reduction are still valid because offering favorable conditions of access to our exports allows and will allow us in the future to keep on receiving the benefits that we have had in the past. The National Planning Department indicators, which measure the level of poverty in the country, indicate that in 2000, the national index recorded 55 per cent, in 2002 53.7% and in 2008 was reduced to 46% . In regards with exports from the year 2002 in which our external sales totaled 11.975 million dollars, a continuous and sharp growth of 37.626 million dollars in 2008 has been reached. Foreign investment has also established itself year after year,

recording in 2002 - 2134 million dollars, in 2006: 6.656 million and in 2008: 10,600 million dollars.

a company
Colombia, Sur Amércia
Consultoría

Siguen siendo válidas, más como principios, que como expresión de la práctica deseable.

a business association
Ecuador
Ecuadorian Exportes Federation

Efectivamente, los objetivos contemplados en la comunicación de 2004 de la Comisión Europea y plasmados en el Reglamento 732/2008 continúan siendo válidos. El mejor aprovechamiento y perfeccionamiento del sistema coadyuvará aún más a la reducción de la pobreza en los países beneficiarios del esquema preferencial.

Esta mejora en las condiciones de vida a su vez impulsa la mejor gobernanza creando un círculo virtuoso en beneficio del desarrollo y el bienestar de la población.

Existen sin embargo algunas mejoras al esquema preferencial que permitirían una mejor consecución de los objetivos planteados en el reglamento antes mencionado.

a) Ampliación de la cobertura de las preferencias a productos de los que dependen amplios segmentos de la población menos favorecida. Algunos de los productos que podrían sumarse a la cobertura del SGP son: banano, sardinas preparadas, crustaceos, té negro, harina de maíz, yuca, algunas hortalizas preparadas, tabaco, macadamias, panela, productos con contenido de azúcar, etc.

b) Mejoramiento y simplificación de trámites y procedimientos en materia aduanera y de certificación de origen.

c) Ampliar la información sobre transparencia estadística, especialmente relativo al mecanismo de graduación, orientando los umbrales de manera tal que el esquema funcione mejor para los países que más necesitan del sistema.

a business association
Ecuador
Tuna Industry

Yes, the stated current objectives of the EU GSP remain valid.

other
Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

The objectives contained in Communication 2004 of the European Commission and Regulation 732/2008 remain valid.

The following remarks regarding every specific objective are deemed necessary to be introduced:

a) Maintaining a generous tariff offer: Key products for the international trade of developing countries are still not covered by the GSP of the European Union. In this sense, it is important to consider enlarging the GSP coverage to the following products, among others: Whole fish, fish fillets and other fish meat, fresh, chilled or frozen. Sardines in tomato sauce. Crustaceans (prawns, lobsters, shrimps, crabs among others), raw whether in shell or not, live, fresh, chilled, frozen, dried, salted or in brine, cooked by steaming or by boiling in water, whether or not chilled and the other Live plants, roses and other flowers (flowers in miniature, Gypsophila, Aster, Alstroemeria, and others. Manioc roots (cassava). Bananas (cavendish, valery) including plantain, baby banana, others fresh or dried. Guavas, mangoes, papaws (papayas), pitahayas (cereus spp.), frozen coconuts, dried, uncooked or cooked by steaming or boiling in water, even containing added sugar or other sweetening matter, and/or, fruit concentrate. Pepper of the genus Piper, fruits of the genus Capsicum or pimento, dried or crushed or ground, no crushed, no ground. Maize flour for consumption. Starch of manioc. Semi whitened and whitened rice. No frozen artichokes prepared or preserved. Black tea (fermented) and partly fermented tea, in other forms presented. Lemons (Citrus limon, Citrus limonum) fresh. Tobacco black and Virginia Cucumbers and gherkins, fresh or chilled Macadamia nuts fresh or dried Other cereals (quinoa triticales) Broken rice Panela (non centrifugal sugar)

b) Concentrating the GSP in countries which most need it: in this item, for example, it is considered necessary to reduce the thresholds for graduation, so as to target the benefits among countries that are still developing their exports to the European Union and have not yet acquired sufficient competitiveness conditions in that market. Notwithstanding, Ecuador is of the opinion that the graduation mechanism shall not under any circumstances be applied to the GSP+ beneficiary countries, because these countries are already fulfilling stringent and high implementation conditions required by the international conventions, conditions which are not requested from the standard GSP and EBA beneficiaries.

c) To propose a simple and easy access to the GSP: this is a topic which well deserves a more in depth work by the European Union in order to complement the tariff offer. In this sense, non tariff barriers treatment should be incorporated to the GSP because it is an indispensable component of any market access policy. For that effect, clauses containing longer transitional periods for the application of SPS measures, technical standards or customs regulations should be incorporated, as well as granting non reimbursable economic and technical co-operation to help beneficiaries countries to implement such measures. This should be especially relevant in order to fulfill European Union regulations in areas such as Novel Foods (Regulation 258/197 and Commission's Recommendation No 97/618/EC) or the REACH Regulation (Regulation 1907/2006).

d) Having a more transparent graduation mechanism, more targeted on the main beneficiaries: it is also valid and applies to this point the aforementioned in paragraph b).

e) Definition of new incentives in order to foment sustainable development and good governance: it is also valid and applies to this point the aforementioned in paragraph a), as well as answer 28.

f) Improving the rules of origin: According to what was informed by the European Union this point is not covered by current GSP review process. Nevertheless, the maintenance of the conditions for the cumulation of origin that currently benefit Ecuador under the GSP (Regulation EEC 2554/93) should be taken into account in the reform process of the regime of origin. This implies the maintenance of the option to accumulate origin with countries in the region which have signed trade agreements with the European Union.

g) Reinforcing the temporary withdrawal instruments and antifraud measures: these instruments and measures shall be reinforced because the effects are detrimental not only to European producers but also to exports from developing countries.

a business association

Finland

Trade Policy

Yes, but the GSP should deliver more than today. The rules should be made more simple, especially for the least developed countries. The GSP+ should also address more protection of intellectual rights, reduction of barriers to trade in raw materials etc. in addition to those aspects which are already covered by the GSP and GSP+ arrangement.

a business association

Finland

Pulp, paper, paperboard and wood products industries interest representation

The focus must be on the poorest countries. Numerous states in Africa need the EU's help to improve the governance and law enforcement.

a company

Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.

Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products

They remain valid. However, the scope of the GSP scheme (coverage) should be revisited.

a business association

France

MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies

The EU GSP is a valid instrument but achieving its purposes (e.g. reducing poverty, supporting sustainable development and good governance) also requires huge internal efforts from Developing countries to reform and modernize themselves through domestic liberalization, economic and investment reform, better governance or trade facilitation.

a business association

France

Textile

Yes because the GSP system is focused on the countries most in need with the graduation mechanism. It's important to help these countries LDL in priority and to maintain the graduation mechanism.

a business association

France

Fishery products - Tuna

Yes

a business association

Germany

Industry

Yes, the objectives of the GSP - namely reducing poverty, supporting sustainable development and good governance - continue to be valid. Therefore, this instrument should focus on really poor countries (LDCs).

a company

GERMANY

PHARMA/CHEMICALS

We support the opinion that the objectives of the GSP - namely reducing poverty, supporting sustainable development and good governance - continue to be valid. In order to meet its purpose, this instrument should, however, focus strictly on really poor countries (LDCs).

a company

Germany

chemical sector

The GSP objectives, such as reducing poverty as well as supporting sustainable development and good governance, remain valid and noble objectives. Objectives should however focus on the poor and least developed countries which most in need of it. Especially, these countries need to be better integrated in the international trading system through trade preferences.

a company

Germany

Think-tank for European and international economy and governance

They should remain valid.

a company

Germany

Yes, see also above.

a company

germany

chemical production

The preferences shall be linked to fair working conditions for the workers in developing countries comparable to those in the EU, esp. for occupational health, safety and environmental protection. As long as the advantages in developing countries are achieved by poor working conditions with a high risk for the workers health/life it is counterproductive

a company

Germany

production of fine chemicals on request - toll manufacturer for fine chemicals

No, there is an unfair trade resulting. Those development countries that create barriers for imports block the local industry from the world's potential, those who support exports by subsidies hinder a fair trade between all countries, including development countries. Besides the trade issues, there are also environmental concerns: A lack of environmental protection destroys the development countries and does not support modern and safe production technologies.

a no profit organisation

Germany

trade union

International trade is one instrument to generate growth in developing countries. But, economic growth has to go hand in hand with the protection of workers' rights, with real democracy, codetermination and high environmental standards. The objectives of the EU GSP remain valid, but still need to be revised. Real measurable improvements of the living working conditions should be mandatory to get a preferential access to European markets.

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

Yes, the objectives of the GSP - namely reducing poverty, supporting sustainable development and good governance - continue to be valid. Therefore, this instrument should focus on really poor countries (LDCs).

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Ecuador, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

The mentioned objectives are valid, but it has to be also got that these countries should develop internally a strong industrial capability and their domestic consumption. Thus, as well as sustainable development and good governance, the respect of human & labor rights, the environmental protection and sanitary and phytosanitary measures should be considered, which undoubtedly are related to the socioeconomic and trade development of the countries. In short, the GSP, through their regimes, should ensure that their beneficiary countries assume their commitments in the framework of the international agreements on social & human & labour rights, environmental protection, governance,...

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Ecuador, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

The mentioned objectives are valid, but it has to be also got that these countries should develop internally a strong industrial capability and their domestic consumption. Thus, as well as sustainable development and good governance, the respect of human & labor rights, the environmental protection and sanitary and phytosanitary measures should be considered, which undoubtedly are related to the socioeconomic and trade development of the countries. In short, the GSP, through their regimes, should ensure that their beneficiary countries assume their commitments in the framework of the international agreements on social & human & labour rights, environmental protection, governance...

a no profit organisation

India

Research in International Economic Relations

The first part of the current objectives of the EU GSP, that is, to contribute to the reduction of poverty in developing countries by generating revenue through international trade, should be

the main objective of the programme, and should not be lost sight of. Other objectives of the EU GSP, that is to give support to sustainable development and good governance, are valid by themselves but not as conditionalities to the grant of preferences. These objectives should be promoted by means of official development assistance (ODA) and dialogue rather than by modulating trade benefits.

other

India

Higher Education ---- An Academic in a Central University, under the HRD Ministry, Government of India

Actually not in the current form. The commodity composition and choice of beneficiaries need to be drastically reviewed.

a no profit organisation

Italy

Education and Research

Valid more than ever. Specially now with the global economic crisis

a no profit organisation

Italy

REsearch and Education

The general objectives are still valid, but in my view the scheme needs several improvements, some of which are related to graduation, Rules of Origins and the overlapping with other PTAs.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

Yes

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

Yes, we consider that the same objectives of GSP remain valid.

a company

Malaysia

Textile

Yes

a company

Malaysia

Export Pepper

Remains valid

a company

Malaysia

Garments

Yes

a company

Malaysia

Screw, Nut & Washer

Yes

a company

Malaysia

Manufacturing

Remain valid.

a company
Malaysia
Manufacturer of furniture
Yes. It is.

a company
malaysia
manufacturer of hydraulic rubber hoses
Yes it should be remained valid.

a company
Malaysia
Screw fastener manufacturer
Yes, it remains valid.

a company
Malaysia
Manufacturing
Yes, the objectives of EU GSP is remain valid.

a company
Malaysia
Manufacturer
yes

other
Malaysia
International trade and industry ---- Ministry of International Trade and Industry Malaysia
Yes, the stated current objectives of the EU GSP remain valid.

other
Mauritius
International Trade ---- Government official
so far the EU GSP remain valid

a business association
Myanmar
Garment and Apparel Manufacturing
It should remain valid because the objectives of the EU GSP reflect a very high moral and ethical principle. It should also be considered intensively to remove this privilege because it can magnify the effect on a vast range of poor people. As in Myanmar, the sanction hits the wrong people, poor people, who lose their jobs in many sectors, like garment factories which were closed down after a various sets of economic sanctions.

a business association
Myanmar
Association
**The objectives of the EU are to contribute to the reduction of poverty and to giving support to sustainable development and good governance, which are very noble.
To pursue these objectives, it would be a morally justified measure by EU to consider re-instatement of the GSP to the punished countries which are most strongly, in need of these kinds of contributions and supports, like Myanmar, where private sectors and working class are suffering from poverty and hardship.
It is well known that in other countries in similar contexts, a middle class has been an important factor in orchestrating political and economical change, but the economic boycott of the EU contributes to preventing a middle class from emerging, hence placing the people of Myanmar more into nowhere. This could not have been the intention of EU.**

a citizen
Myanmar

observer

you should consider how people affect on the Current GSP. If Current GSP harm to people, it should be modified.

a company

Myanmar

Information Supply

Yes it is valid.

other

Panamá

Servicio ---- Ministerio de Comercio e Industria de Panamá

Los objetivos que se establecen en este régimen de preferencias, contribuyen a la reducción de la pobreza mediante la generación de empleos e ingresos a través del comercio internacional y da apoyo al desarrollo sostenible de los países en desarrollo. La validez del SGP concede acceso preferencial, no recíproco y no discriminatorio al mercado de la UE beneficiando a alrededor de 180 países y territorios en desarrollo, entre ellos Panamá.

a business association

Paraguay

National development of the Export sector

Taken for its alone, it may not be sufficient, because the exports requiere important investment in infrastructure, product development, documentation and marketing. But is an important contribution, among other developping initiatives.

a company

Paraguay

Sugar and Alcohol

Yes

a company

Philippines

manufacturer and exporter of home & garden decors

Yes.

a company

Philippines

Manufacturing of packaging products

Yes, to remain valid.

a company

Philippines

Agriculture and Aquaculture

Very valid as investments would spur economic activities thereby providing employment and other opportunities

a business association

Portugal

Textile and Clothing Industry

further efforts should be displayed in ensuring an effective accomplishment of the GSP objectives. The current regime still favours a limited number of countries which in some cases have high GDP growth rates and are considered to be strong emerging economies (eg. India, Brazil). The concentration of the GSP benefits in certain countries is clearly undermining the core objectives of the instrument. In parallel the EU should engage in closer cooperation with developing countries by promoting capacity building actions to ensure a consistent and long-lasting achievement of the sustainable development and good governance objectives.

a company

Qatar

manufacturing

Yes

a company

Qatar

Liquefied Natural Gas

Yes - an objective that contributes to the reduction of poverty and the promotion of sustainable development and good governance in developing countries would seem commendable.

a business association

Spain

Fisheries

An objective of supporting investments in developing countries should be added to the ones stated, since promoting international trade is not enough.

a citizen

St Vincent & the Grenadines

ICT 4 Development and trade in Services

Yes

a business association

Sweden

The Association of Swedish Chambers of Commerce representing Swedish companies. The Swedish Chambers of Commerce are regional, independent, non-profit making organizations, funded by the members.

We believe that one of the most important means for poverty reduction is through the economic growth created by international trade and investment. Thus the objectives remain valid.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 2. The aim of GSP has to be simplified. It should only concern economic growth in poor developing countries. The present additional goals, the political ones about almost everything and the romantic industry policy ones, reflected in the origin requirements are only resulting in a not very effective system that China beats every second of the year. And the additional goals only make the system inefficient for its original purpose. And GSP Plus is a farce, no country in the world, not even Norway or Germany live up to all regulations in the 27 conventions GSP Plus countries are supposed to do. This also creates to big risks for importers to use the system as the same could happen to any GSP Plus country that have happened to Sri Lank. For political reasons a breach of the rules in the conventions can be found at any time. Trade embargoes must be out of GSP. Leave that to UN Security Council

other

Switzerland

Policy research and negotiation assistance ---- International organization

It should also reflect international best practice on development cooperation, for example principles expressed by the Paris Declaration 2005. The most important of them is ownership. This means that developing countries set their own strategies for poverty reduction, industrial development, establish their own regulatory frameworks and manage and implement development projects. Consequently, the GSP regulation should allow countries to choose their own products of export interest. Secondly, the link between investment and trade should be recognized. Sustainable investment, as an important part of sustainable development, could lead to increased production and trade.

other

Syrian Arab Republic

Customs ---- Government sector

Yes I do

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

Yes. International trade is one of the most effective factors to stimulate economic growth. An increase in trade creates more employment, higher income and thus reduces poverty.

Moreover trade between developed and developing countries (North-South trade) will lead to positive spillovers such that developing countries will benefit not only from higher income but also from gaining knowledge/technology know-how from trading with advanced countries.

Many developing countries with a natural competitive advantage in certain products use trade preferences to gain a foothold in the international market.

On the other hand, the GSP has sometimes also encouraged Thailand to develop industrial sectors which otherwise would not have been able to compete.

For instance, Thailand's export of electrical appliances reached almost twice as much of the outbound shipments in 2008 at US\$17.6 billion in 2008 than those in 2002 which totaled just US\$9.7 billion. The electrical appliance and electronics industry has been well-established and the exporters in these industries have been able to expand the industries' international reach through GSP schemes.

Thai government extends strong support to promote the electrical appliance and electronics industry production and investment. The electrical appliance and electronics industry are encouraged to upgrade technical capability in order to expand beyond OEM to ODM production. Furthermore, the government-backed cluster development programme fosters growth by putting hard disk drives (HDD) and component factories in proximity, reducing makers' transportation costs and thereby helping them in keeping their prices competitive through efficient supply chain management. As a result, the HDDs has become the main products of this sector accounting for 40 per cent of the country's total electronics exports. In 2008, Thailand's exports of electrical appliances and electronics increased from US\$24 billion in 2002 to US\$47 billion.

Furthermore, nearly 43 per cent of manufacturers are Japanese including Sony, Hitachi, Mitsubishi and Panasonic as well as other world-class producers from the rest of the world are Electrolux, Schneider, Honeywell, Emerson, Carrier, LG and Samsung - leading to positive spillovers from which Thailand benefits in the form of higher income, employment, knowledge, know-how, technology transfer.

Despite such growth and development through international trade, Thailand was also impacted by the global financial recession in 2008 which slowed its growth down 2.6 per cent. The contraction continued in 2009 showing the decrease of Thailand's first quarter GDP by 7.1 per cent year-on-year, 60 per cent of which accounted in the capital due to the rapid economic growth in and around Bangkok causing regional income differentials.

Although Thailand's economy has demonstrated in recent years moderate positive growth, still, its future performance depends on preferential market access for its exports of goods and services, attracting foreign investment, improving consumption balance past reliance on exports. Thus it is crucial that the EU reiterates its primary objective in the new Regulation to contribute to the reduction of poverty and the promotion of sustainable development and good governance by ensuring that the substance of the scheme remains unchanged from that established under the current Regulation.

a citizen

UK

Construction

Yes

a citizen

UK

Economic research

Valid, but not sufficient: see Q 3

a company

UK

Import and Distribution

yes, they remain valid

a no profit organisation
UK

Development Education, campaigns + advocacy

Given the effects of the global recession, given that progress towards poverty reduction has gone into reverse in some areas, and given increasing protectionist pressures in the developed world, these objectives are more valid than ever.

other
UK

Multi sector trade union - public services, manufacturing and commercial services ---- trade union

Given the depth of the global financial crisis, and the terrible impact it has had on some of world's poorest workers, the sustainable development objectives of the GSP scheme are more valid than ever, but again must be strengthened and effectively implemented and monitored to ensure that they achieve the aims of helping and supporting poorer workers and citizens. The crisis has caused a large contraction in world trade that has hurt some of the poorest exporting countries.

The market access provided by GSP to developing country exporters is making an important contribution to economic recovery in these countries. As ILO research has recently concluded, countries maintaining strong systems of social protection, and respect for core labour standards have weathered the crisis best.

The GSP system should be aiming to play an even more effective role in promoting such models. The revised regulations should reflect the central importance of both Core Labour Standards, and the broader concept of the Decent Work Agenda putting these principles at the core of the text, and include reference to the 2008 ILO Declaration on Social Justice for a Fair Globalization - the definitive statement of the Decent Work Agenda, endorsed at the highest levels of the international system as well as the ILO's 2009 Global Jobs Pact.

a business association
United Kingdom
Seafood importation
No comment

a no profit organisation
United Kingdom
animal welfare

The goals remain valid but could potentially be extended, particularly in areas of sustainable development and good governance. In respect of animal welfare, since the Lisbon Treaty has now specified in Article 13 the recognition of animals as sentient beings the Commission has an obligation to examine where in trade policy an impact may be made to improve animal welfare. There are good examples of where preferences in trade could help to open up the EU market to welfare enhanced products despite the WTO difficulties in recognising production methods.

a no profit organisation
United Kingdom

Representing workers in all sectors in the UK

Given the depth of the global financial crisis and the terrible impact it has had on some of world's poorest workers, the sustainable development objectives of the GSP scheme are more valid than ever. Firstly, the crisis has caused a large contraction in world trade that has hurt some of the poorest exporting countries.

The market access provided by GSP to developing country exporters is making an important contribution to economic recovery in these countries. Secondly, as ILO research has recently concluded, countries maintaining strong systems of social protection, and respect for core labour standards have weathered the crisis best.

The GSP system can play an even better role. Accordingly, the revised regulations should reflect the central importance of both Core Labour Standards, and the broader concept of the Decent Work Agenda in its preamble. In particular, it should refer to the 2008 ILO Declaration on Social Justice for a Fair Globalization - the definitive statement of the Decent Work Agenda, endorsed at the highest levels of the international system. In addition, it should refer to the ILO's 2009 Global Jobs Pact.

a company
Uruguay
Tanned sheepskins and garments.
They remain valid.

a company
Uruguay
Exportacion de Miel , Cera y Propoleos organico y convencional
Si son validas

Q3: Apart from the objective to contribute to the reduction of poverty by generating revenue through international trade and giving support to sustainable development and enhanced good governance, are there any other specific development, financial and trade needs relevant for developing countries to which the GSP scheme could respond positively? How could these needs be addressed?

a business association
Austria
representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members
Das APS muss - um effektiv zu sein - vorhersehbar, stabil und einfach sein. Das gilt auch für die Ursprungsregeln, die dem Importeur Sicherheit geben sollten. Wichtig erscheint uns, dass das EL dahingehend gefördert wird, ihr Produktspektrum möglichst breit zu streuen und nicht auf nur einzelne Segmente allzu sehr zu konzentrieren.

a business association
BANGLADESH
INDUSTRY AND BUSINESS CHAMBER ACTIVITIES
GSP SCHEMES SHOULD NOW FOCUS ON QUALITY OF THE PRODUCTS. ANY PRODUCT THAT HAS GOOD EU TECHNICAL SUPPORT SHOULD GET EASIER ACCESS -EG LOWER LOCAL CONTENT ETC TECHNICAL SUPPORT IS NOW MOST IMPORTANT FOR LONG TERM BENEFIT AND SUSTAINABILITY

a business association
Belgium
International trade in flowers
The GSP duty concessions in the floriculture sector are very important for the private sector as they have been securing the development of the flowers industry over the years. However, besides this, more support and incentives could be implemented (in the form of financial support, capacity-building, training, etc) in order to ensure that Phytosanitary standards are adequately respected and that all exporters comply with internationally recognised standards.

a business association
BELGIUM
NITROGEN FERTILIZERS
No comment

a business association
Belgium
representing interests of companies of all sizes and sectors of activity in Europe
The stated objectives are ambitious and therefore require the GSP to be focused and coherent. However, there is room for improving the effectiveness of GSP preferences in encouraging business climate improvement and economic reform, for example through accompanying capacity-building projects. This would contribute significantly to economic development.

a business association
Belgium
To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

We believe that preferences are not enough to boost trade. Accompanying measures focused on capacity building are needed.

a business association

Belgium

Trade association: Man-made fibres

N/C

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

The stated objectives are already ambitious enough not to overload the instrument with other ones, making it more complex in its concept and difficult to implement in practice.

a business association

Belgium

Textiles & Clothing

Economic diversification is essential to guarantee a sustainable and steady growth. Promoting alternative ways of development and wealth foundation in the developing countries should be encouraged under the GSP regime. However data shows that Textile and Clothing accounts for a significant part of GSP Imports and that this share has not suffered significant changes over the years.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

To ensure the effectiveness of the GSP, it is important not to overload the scheme. The Generalised System of Preferences will deliver the best results if it is simple, stable and predictable.

a business association

Belgium

Representing the foreign trade interests of European retail trade

GSP is a relatively independent instrument of development policy. Nevertheless, it can be combined with all other instruments promoting developing countries.

a citizen

Belgium

Finance

No

a company

Belgium

Import of food items

The basic objective is wonderful. The facts and results are in full contradiction with those objectives...

a no profit organisation

Belgium

Development NGO

Developing countries and least-developing countries need to foster regional integration. The GSP should provide DCs and LDCs with the with the same trade regime if they are members of a customs union

a no profit organisation

Belgium

Agricultural and Agrifood Trade

No comment

a no profit organisation

Belgium

Economic justice

The GSP system has to remain a unilateral system, which does not demand reciprocity from developing countries. Imposing market openings, access to raw materials, stringent IP norms, norms on investments and government procurement on developing countries would annul any positive effect GSP could otherwise have on their development.

other

Belgium

Representing working people in all sectors throughout Europe ---- European Trade Union Confederation

Through its structures and implementation, the GSP scheme should aim to improve the capacity of representative organizations such as democratic trade unions in developing countries to play a more active part in the good governance of the country by involving them more in the negotiation, monitoring and enforcement of such schemes.

other

Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)

Through its structures and implementation, the GSP scheme should aim to improve the capacity of representative organizations such as democratic trade unions in developing countries to play a more active part in the good governance of the country by involving them more in the negotiation, monitoring and enforcement of such schemes.

other

Belgium

advising our members, interest representation ---- Cefic

Within "support of good governance", a comprehensive elimination of non-tariff barriers to trade as well as the fight against corruption must be pursued consistently. This is directly linked with the need to create a corruption-free environment for customs. EU importers of GSP beneficiary products must be able to count on the reliability of data gathered in the coming REX database.

a no profit organisation

Belgium, Brussels

leather sector. COTANCE represents interests of National Associations of Tanners and Dressers

LDCs need to get a serious comparative advantage with respect to other developing countries. This is not the case when the general system already eliminates the duties for most products in entire sections and developing countries and LDCs are put on an equal footing. Their more competitive developing counterparts often take up the majority of market opportunities for the product concerned. LDCs and other vulnerable economies also suffer the implementation of unfair trade practices by their more developed developing counterparts.

a no profit organisation

Bolivia

Exportaciones

El SGP + puede ser mejorado con otras medidas colaterales, como ser la generación de fuentes de financiamiento para las empresas exportadoras, asistencia técnica para la adaptación de productos y la promoción de los mismos en la Unión Europea.

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

Yes, the elimination of tariff and non tariff restrictions for agricultural products and textiles and apparels.

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

El esquema debería considerar la identificación y generación de fuentes de financiamiento para las empresas exportadoras, asistencia técnica para la obtención competitiva de los productos y promoción de los mismos en el mercado europeo.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

Yes, the elimination of tariff and non tariff restrictions on agricultural products and textiles

a no profit organisation

Bolivia

industry

As a single trade scheme, it is very difficult to make the GSP+ an instrument for development, in our concept it contributes to the development but it would need of collateral mechanisms to make it the "scheme" that will impulse development in poor countries. In order to determine how well our countries are doing accessing the European market it would be necessary to count with an GSP+ evaluation instrument that so far no one knows, considering that the eligibility of a product is turned to a real use just when the goods are dispatched to consumption by the European customs.

other

BOLIVIA

EXPORTS ---- Government representative

Yes, it could be a good idea to go over the lists of preferences so that products in the list are really related to strategic productive sectors in the country.

other

Bolivia

Government ---- Government Official

For the GSP to improve it would be necessary to help beneficiaries in making it effective, by addressing their needs with regards to trade, particularly when it concerns compliance with requirements. It could also be targeted to the producers that most need it, in order to ensure the diversification of exports.

other

Bolivia

Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio

Consideramos que el SGP puede ser mejorado con otras medidas colaterales como ser la generación de fuentes de financiamiento para las empresas exportadoras, asistencia técnica para la adaptación de productos y la promoción de los mismos en la unión europea.

a business association

Brazil

industrial sector

No. The current GSP main objectives gather crucial factors that meet the substantial demands of the Developing countries in terms of production, exports and their relation with a sustainable development and poverty reduction.

other

Brazil

Government ---- Ministry of External Relations - Federative Republic of Brazil

The development needs of developing countries deriev from their national development priorities. The EU should avoid defining priorities of development for developing countries and should not use the priorities it establishes unilaterally as conditions for preference granting. In the same line, we believe that trade preferences should not be used as a tool for developed countries to achieve their foreign policy goals regarding beneficiary countries. Eligibility criteria should be transparent and objective.

a company

Cambodia

Export

The GSP should be handed to a country being object to contribution to the creation of Investment, increasing the productivity of their own production and to the country that has a goal of poverty reduction in their own area development and country.

other

Colombia

Tourism and Trade (Import-Export) ---- Government of Colombia

The GSP could offer cooperation in order to promote exports from beneficiary countries in the EU market through assistance for participation in fairs or organizing specific events giving the opportunity to large European comparators to expose the advantages of our exports, both agricultural and industrial. Similarly, one could explore the possibility of making beneficiary countries into exporting platform in order to reach other markets both with goods and related services, with which the EU has no preferential trade agreements. Cooperation in the preparation and adaptation of the Colombian exportable offer relating to technical and sanitary requirements can be particularly relevant. Organizing seminars or short conferences for the large European importers to know tariff advantages of the GSP could also be an interesting option. Today there are many importers who are unaware of this valuable tool and for this reason, they have not orientated their purchasing preferences towards countries benefiting from the GSP.

a company

Colombia, Sur América

Consultoría

Actualizando (y modulando según las realidades regionales) las nociones de comercio, de desarrollo sostenible y de gobernabilidad. - La generación de ingresos, como instrumento en la lucha contra la pobreza, está unida a una nueva noción del comercio internacional en la cual se incluya la asociatividad entre empresarios europeos y de América Latina y el Caribe. - Esta asociatividad (como política pública) debe generar bienes y servicios de aquí hacia la UE y a la inversa. -Esta sociatividad (como política pública) debe visualizar como cosa fundamental el mercado (sobre todo hispano) de USA.

a business association

Ecuador

Ecuadorian Exportes Federation

EL SGP+ podría diseñar mecanismos que incentiven especialmente la incorporación de productos de mayor valor agregado al comercio exterior. Simplificaciones a los requisitos de origen sin duda pueden contribuir con este propósito. De igual manera, simplificaciones en materia de obstáculos técnicos y barreras sanitarias y fitosanitarias para productos nuevos como los denominados Novel Foods pueden tener un efecto multiplicador en la incorporación de nuevos agentes comerciales a los beneficios del comercio exterior. La combinación del esquema preferencial con otras iniciativas derivadas de iniciativas de cooperación europea para la implementación de programas y proyectos de inversión productiva puede multiplicar efectos positivos en el desarrollo sostenible de las economías beneficiarias y su mejor gobernanza.

a business association

Ecuador

Tuna Industry

GSP+ is also a valid instrument to fight against drug traffic and other ilegal activities in latin american countries, by providing a large ampunt of licit jobs.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

Taking into account that, in part, the GSP+ regime had its origin in the GSP Drugs scheme, it would be advisable to improve the access that it provides to products related to alternative and preventive alternative development and that beneficiary countries have implemented in the fight against the drug trafficking. In addition, it would be possible to design mechanisms within the GSP to support the development of productive investments in the beneficiary countries, as

well as of non reimbursable economic and technical co-operation for allowing the development of their export potentialities.

a business association

Finland

Trade Policy

GSP and GSP+ should underline more trade facilitation.

a business association

France

MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies

GSP scheme would encourage Developing countries to strengthen customs cooperation with EU, simplify and dematerialise their Export/ Import procedures, in particular with regard to the forthcoming reform of Rules of origin. Indeed, this EU reform will deeply change the way to prove/ certify the origin (register of exporters, removing of Form-A...). EU importers of GSP beneficiary products must be able to count on the reliability of the coming REX database. Technical program should be delivered to Developing countries, within « Aid for Trade» programs or thanks to EU bilateral co-operations. In parallel with its policies of preferential access, EU should focus its development assistance on aid-for trade (e.g. infrastructure projects, compliance with EU standards...). EU should also encourage to its Developing partners to conclude the WTO Trade facilitation.

a business association

France

Fishery products - Tuna

Sourcing of tuna products from GSP+ for EU canning factories

a business association

Germany

Industry

Within "support of good governance", a comprehensive elimination of non-tariff barriers to trade as well as the fight against corruption must be pursued consistently. This is directly linked with the need to create a corruption-free environment for customs. EU importers of GSP beneficiary products must be able to count on the reliability of data gathered in the coming REX database.

a company

GERMANY

PHARMA/CHEMICALS

We are sharing the view that within "support of good governance", a comprehensive elimination of non-tariff barriers to trade as well as the fight against corruption must be pursued consistently.

a company

Germany

chemical sector

Within "support of enhanced good governance", a comprehensive elimination of non-tariff barriers to trade as well as the fight against corruption and increased capacity building must be pursued consistently. This is directly linked with the need to create a corruption-free environment for customs. EU importers of GSP beneficiary products must be able to count on the reliability of data gathered in the coming REX database.

a company

Germany

Think-tank for European and international economy and governance

No, the GSP scheme has its traditional merits.

a company

Germany

No.

a company

Germany

chemical production

an audit done by the responsible local governmental body to evaluate the working conditions could be of help in order to improve the conditions in developing countries and to verify that only the right people/companies will get an advantage from GSP

a company

Germany

production of fine chemicals on request - toll manufacturer for fine chemicals

sustainable development also requests ethical and environmental standards in the producing countries. As long as goods that are produced under different conditions fall under the same GSP routes, the country that does less for education and environment may have a commercial advantage against others.

a no profit organisation

Germany

trade union

The overall aim of development policy should be building the ground for self sustained development. In a plural society democratic institutions like trade unions are primordial to achieve this goal. For this reason GSP should strengthen those institutions through a real right to participate in the assessment of a country's performance before giving preferential treatment.

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

Within "support of good governance", a comprehensive elimination of non-tariff barriers to trade as well as the fight against corruption must be pursued consistently. This is directly linked with the need to create a corruption-free environment for customs. EU importers of GSP beneficiary products must be able to count on the reliability of data gathered in the coming REX database.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Ecuador, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

The GSP scheme as an instrument the European Community's trade policy should help developing countries to fully exploit the benefits from trade and address structural weaknesses to facilitate their integration into the world economy by promoting growth, employment, development and poverty reduction, ... Aid for Trade is a very important factor in this context, but it requires to carry out an impact assessment to establish which countries really need help, support and cooperation.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Ecuador, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

The GSP scheme as an instrument the European Community's trade policy should help developing countries to fully exploit the benefits from trade and address structural weaknesses to facilitate their integration into the world economy by promoting growth, employment, development and poverty reduction, ... Aid for Trade is a very important factor in this context, but it requires to carry out an impact assessment to establish which countries really need help, support and cooperation.

a no profit organisation

India

Research in International Economic Relations

Other development, financial and trade needs are related to the main objective of contributing to the reduction of poverty. The GSP results in augmentation of export earnings of developing countries. By increasing access to markets for processed and manufactured goods it creates avenues for employment, which is the surest means for alleviating poverty.

other

India

Higher Education ---- An Academic in a Central University, under the HRD Ministry, Government of India

GSP should look at issues related to sustainable development from the point of view of the beneficiaries. There are vital issues related to labour standards, traditional knowledge, IPRs etc those are hardly been addressed by GSP in its present form. More benefit could accrue to these countries, if the commitments under the Uruguay Round related to Special and Differential Treatment, MFA, AOA, technology transfer etc are adhered to in letter and spirit.

a no profit organisation

Italy

Education and Research

Needs to increase total factor productivity. No trade barriers means more competition. Therefore the need to increase productivity through investment in education and R&D

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

One of the need to take account of in aiming at developing the economies of LDC is the environmental problem (for the long run). This should be addressed by considering some differential regime for different environmental impact of products.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

No, all relevant policy goals have been already covered.

a company

Malaysia

Textile

No

a company

Malaysia

Export Pepper

Nil

a company

Malaysia

Manufacturing

Besides of reduce poverty, GSP can be consider as a method to increase competitiveness of many companies in developing countries. This is because there are still a lot of companies in Malaysia started to improved their products' quality with comply to ISO standard or HACCP in order to enter into the world market, especially western countries.

a company

Malaysia

Screw fastener manufacturer

Yes, both financial and trade expertise from developed countries could be benefitted to developing countries.

a company

Malaysia

Manufacturing

By having GSP, Malaysian products will be given reduced import duty which will enable the products to compete competitively with other products from developed countries. Thus, Malaysian products will have preference compare to product coming from Non GSP countries. Hence demand for the goods will increase, which subsequently will create more jobs in Malaysia.

other

Malaysia

International trade and industry ---- Ministry of International Trade and Industry Malaysia

GSP scheme could enhance the bilateral relationship and cooperation between EU and beneficiary countries

other

Mauritius

International Trade ---- Government official

The GSP scheme should be applied in such a manner to target small vulnerable island economies including LDCs and SIDS. Emerging economies still benefitting from the scheme should be excluded.

a citizen

Myanmar

observer

For socioeconomic development for people

a company

Myanmar

Information Supply

The EU should allow GSP to be resumed for Myanmar. It is hypocritical for the EU to have a scheme which is suppose to develop countries as a measure to punish country especially those that makes the poorest of the poor even poorer. i.e. Myanmar garment workers would get more revenue and jobs if there were more orders from the EU.

other

Panamá

Servicio ---- Ministerio de Comercio e Industria de Panamá

A parte del objetivo que persigue la UE de contribuir a la reducción de la pobreza y dar apoyo al desarrollo sostenible de los países en vía de desarrollo, la revisión periódica de su reglamentación permite adaptar el SGP a cambios considerables relacionados con el desarrollo financiero y las necesidades comerciales de estos países tomando en consideración las políticas y los compromisos comerciales multilaterales.

a company

Paraguay

oilseeds processing

Yes, by promoting long term finance for infrastructure for processing of raw materials in the developing countries giving thus an important value added to the exported products.

a company

Paraguay

Sugar and Alcohol

In Paraguays particular case, I think the objective and the contribution from the EU would be pretty low. But it is probably because of the local authorities, actual and past. There is not a good development from the government to help people understand the privileges and opportunities we have in working with the GSP.

a company

Paraguay

manufacture of lumber

Financing for new technologies from Europe as good quality machines with very low rates of interest and long term for payments.

a company

Philippines

Agriculture and Aquaculture

Yes, there are other needs. For the local industry to survive and become feasible, foreign investments should come it. This would encourage economic activities providing employment, exports and trade, etc.

a business association

Portugal

Textile and Clothing Industry

Economic diversification is essential to guarantee a sustainable and steady growth. Promoting alternative ways of development and wealth foundation in the developing countries should be encouraged under the GSP regime. However data shows that Textile and Clothing accounts for a significant part of GSP Imports and that this share has not suffered significant changes over the years.

a company

Qatar

Liquified Natural Gas

No comment.

a citizen

Republic of Macedonia

Customs

In a more flexible and modern rules

a business association

Spain

Fisheries

Yes, there are. As far as fisheries are concerned, support given by the EU to productive investments (port infrastructures, renewal and modernisation of fleets, etc.) made in these countries is a key element to maintain wealth and eradicate poverty.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 3. As said in the answer to Q2. GSP needs to be focused only on economic growth. Many of the problems with GSP is that it has too many policies in built in the system and they are not only the ones mentioned in the question but also trade policy issues in general, mostly with a protectionist tendency (sensitive products etc) and foreign policy in general (Sri Lanka at the moment).

a no profit organisation

Sweden

RFSL, The Swedish Federation for Lesbian, Gay, Bisexual and Transgender Rights, is the main LGBT-organisation in Sweden with 29 branches all over the country, working with LGBT rights, LGBT health, operating counselling services, arranging social and cultural activities, working with education, facilitating international projects in cooperation with other stakeholders etc. RFSL is a member of ILGA - International Lesbian, Gay, Bisexual and Transgender Association.

Yes with more focus on the human rights situation with more specific demands before getting GSP+ status a GSP+ status could be even more efficient in enhancing human rights. See answer upon question 23.

other

Switzerland

Policy research and negotiation assistance ---- International organization

See also Q2. The GSP scheme could add as objective 'to encourage responsible and sustainable investments.'

other

Syrian Arab Republic

Customs ---- Government sector

Training needs about the GSP right application in order to get the benefit estimated from the part of non EU countries, it has been a long time that we did not participate in any workshops or seminar about GSP and its objectives and its importance, mainly in the field of Agricultural products.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

Development can be achieved through the progressive abolition of restrictions on international trade, the lowering of customs duties and the elimination of all forms of trade barriers. Furthermore, the trade facilitation mechanism and capacity building for both the governmental agencies and private sectors should also be introduced under the new GSP.

a citizen

UK

Economic research

The original objective of GSP was not to help development 'by generating revenue' but by encouraging countries to trade in new commodities and to new markets. All discrimination by product should therefore be removed, and aid for trade should be linked to helping countries move into goods which make a technological or skill-increasing contribution as well as a financial one.

a company

UK

Import and Distribution

yes. A policy that rewards "greener" industrial processes or product

other

UK

Multi sector trade union - public services, manufacturing and commercial services ---- trade union

Through its structures and implementation, the EU Commission's GSP scheme should aim to improve the capacity of representative organizations such as democratic trade unions in developing countries to play a more active part in the good governance of the country by involving them more in the negotiation, monitoring and enforcement of such schemes.

a business association

United Kingdom

Seafood importation

No comment

a no profit organisation

United Kingdom

animal welfare

In order to open up export markets to the EU, the organisations represented believe that developing countries must achieve EU comparative standards in animal welfare, food safety. We believe tariff reductions should apply to those developing countries which can show they have achieved EU comparative standards

a no profit organisation

United Kingdom

Representing workers in all sectors in the UK

Through its structures and implementation, the GSP scheme should aim to improve the capacity of representative organizations such as democratic trade unions in developing countries to play

a more active part in the good governance of the country by involving them more in the negotiation, monitoring and enforcement of such schemes.

a company

Uruguay

Exportacion de Miel , Cera y Propoleos organico y convencional

Los paises en desarrollo necesitan vender mas productos con valor agregado . Es necesario simplificar el acceso a los interesados en estos productos

Q4: Should the objectives of the GSP be adjusted in the light of the newly adopted Lisbon Treaty?

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Nein

a business association

BELGIUM

NITROGEN FERTILIZERS

Key factor is that poorest member states GNP/GDP should act as a reference to exclude high income current beneficiaries of GSP.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

No

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

GSP is not user friendly. We should avoid that by the adoption of the Lisbon Treaty, its use and rules become even more difficult to grasp!

a business association

Belgium

Wood products

In the context of the Agenda 2020, replacing the Lisbon strategy, competitiveness of the EU industry is set as one of the priorities. It should be ensured that the GSP does not interfere negatively with this strategy.

a business association

Belgium

Trade association: Man-made fibres

No

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

No

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

In our view, no such adjustment is needed.

a business association

Belgium

Representing the foreign trade interests of European retail trade

Apart from the more complicated decision making process there is no connection between the objectives of the GSP and the Lisbon Treaty.

a citizen

Belgium

Finance

No

a company

Belgium

Import of food items

Most probably : yes

a no profit organisation

Belgium

Agricultural and Agrifood Trade

No comment

a no profit organisation

Belgium

trade

The main objective is accomplish: reduce poverty by trade

other

Belgium

Representing working people in all sectors throughout Europe ---- European Trade Union Confederation

Article 21 of the Lisbon Treaty states that the Union's action on the international scene shall be guided by the principles which have inspired its own creation, development and enlargement, and which it seeks to advance in the wider world: democracy, the rule of law, the universality and indivisibility of human rights and fundamental freedoms, respect for human dignity, the principles of equality and solidarity, and respect for the principles of the United Nations Charter and international law. Trade policy must reflect these high ideals, including action in relation to the GSP.

other

Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)

Article 21 of the Lisbon Treaty states that the Union's action on the international scene shall be guided by the principles which have inspired its own creation, development and enlargement, and which it seeks to advance in the wider world: democracy, the rule of law, the universality and indivisibility of human rights and fundamental freedoms, respect for human dignity, the principles of equality and solidarity, and respect for the principles of the United Nations Charter and international law. Trade policy must reflect these high ideals, including action in relation to the GSP.

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

No, we think that is not necessary

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

Deberán ser ajustados siempre y cuando no exista contradicción entre los aspectos políticos y los objetivos comerciales que pretende alcanzar el esquema SGP.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

It's not necessary

a no profit organisation

Bolivia

industry

It seems plausible to do that and to involve the European Parliament, but it should not mean that from that incorporation the rules and procedures become more complicated or bureaucratic.

a business association

Brazil

industrial sector

No. The main objective of the GSP (reduction of poverty in developing countries by generating revenue through international trade) shall be considered at the light of the newly Treaty of Lisbon.

a company

Cambodia

Export

No comment.

other

Colombia

Tourism and Trade (Import-Export) ---- Government of Colombia

Colombia considers that, while there will be need for some adjustment from a legislative perspective, it is also true that its objectives and spirit are not contrary to the Treaty of Lisbon: the most important thing is to maintain its continuity. This means that the Lisbon Treaty should extend the adoption of agreements by qualified majority of the Council to many more topics. By replacing the current unanimity requirement, new policies shall be adopted by codecision, which is also most likely with regard to the GSP.

a business association

Ecuador

Ecuadorian Exportes Federation

El Tratado de Lisboa propone entre sus objetivos conjugar todas las capacidades económicas, humanitarias, políticas y diplomáticas de Europa para fomentar sus intereses y valores en todo el mundo, en tal sentido el mencionado Tratado está alineado con los objetivos del SGP ya que también busca corregir los desequilibrios existentes en el comercio internacional. Un esquema de preferencias arancelarias puede y debe ser ampliado a otros mecanismos de cooperación que fomenten desde la profundización del comercio bilateral que promueva el desarrollo sostenible y la vinculación entre Europa y los países beneficiarios en ámbitos de inversión, transferencia de tecnología y asociación política y cultural.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

As expressed in answer 2, the objectives of the generalized system of preferences remain valid, but they need to be adjusted as explained in that answer. One of the aims of the Lisbon Treaty is to use all the economic, humanitarian, political and diplomatic capacities of Europe to foster its interests and values everywhere in the world. Therefore, it is understood that the aims of the GSP might be aligned with a greater effort of the European Union to generate a more balanced international trade, reinforcing the role of the GSP as a supporter of development among the beneficiaries of such system. For that reason, it is fundamental to deepen the tariff

preferences, in the number of products as well as in the coverage of the preferences, including the treatment of nontariff measures, the development of non reimbursable economic and technical co-operation to fulfill environmental and good governance objectives, and to enhance the export potentialities of the beneficiary countries.

a business association
Finland
Trade Policy
Yes.

a business association
Finland
Pulp, paper, paperboard and wood products industries interest representation
The EU must follow and react more closely on the economic and financial development of the BRIC countries. If the EU's interests are threatened, the Union should drop out from the GSP-list such states.

a business association
France
Fishery products - Tuna
Longer implementation periods

a company
Germany
chemical sector
When it comes to GSP objectives, there is no need for adjustment due to the newly adopted Lisbon Treaty.

a company
Germany
Think-tank for European and international economy and governance
In my opinion not necessary.

a company
Germany
No.

a company
Germany
production of fine chemicals on request - toll manufacturer for fine chemicals
we should give up the idea that a product tells us anything about the conditions of its production. Neither GSP nor Lisbon Treaty does reflet this fact. See Q3 and Q2 for referenece.

a no profit organisation
Germany
trade union
European Parliament got more rights in trade policy. In consequence it should be codecide in questions of approving developing countries additional trade preferences. Country applications for schemes like GSP+ should be debated and voted in the EP.

a business association
In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...
Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).
The Treaty of Lisbon considers as important elements, hmong others, the EU position in the world, the sustainable development, the food security , the employment, the trade policy,... Therefore, under Treaty of Lisbon, the GSP should continue to be a key instrument of the EU trade policy in favour of the neediest countries, helping their beneficiary countries to assume their commitments in the framework of the international agreements on social & human &

labour rights, environmental protection, governance, as well as the hygienic-sanitary standards, which ensure the food security of the products. Thus, the Treaty of Lisbon should strengthen the control and verification of all these requirements, particularly, to ensure the quality and food security of the products imported into the EU, which should be obeyed the same standards as the EU products.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

The Treaty of Lisbon considers as important elements, among others, the EU position in the world, the sustainable development, the food security, the employment, the trade policy,... Therefore, under Treaty of Lisbon, the GSP should continue to be a key instrument of the EU trade policy in favour of the neediest countries, helping their beneficiary countries to assume their commitments in the framework of the international agreements on social & human & labour rights, environmental protection, governance, as well as the hygienic-sanitary standards, which ensure the food security of the products. Thus, the Treaty of Lisbon should strengthen the control and verification of all these requirements, particularly, to ensure the quality and food security of the products imported into the EU, which should be obeyed the same standards as the EU products.

a no profit organisation

India

Research in International Economic Relations

Please see response to Q.35

other

India

Higher Education ---- An Academic in a Central University, under the HRD Ministry, Government of India

Yes very much.

a no profit organisation

Italy

Education and Research

I do not think so

a no profit organisation

Italy

REsearch and Education

Yes.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

Not in my opinion.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

No.

a company

Malaysia

Textile

Yes

a company

Malaysia
Export Pepper
Nil

a company
Malaysia
Manufacturer of furniture
No comment

a company
malaysia
manufacturer of hydraulic rubber hoses
yes

a company
Malaysia
Screw fastener manufacturer
Yes.

a company
Malaysia
Manufacturing
NO

other
Malaysia
International trade and industry ---- Ministry of International Trade and Industry Malaysia
Yes, the objectives of the GSP should be adjusted in line with the newly adopted Lisbon Treaty.

other
Mauritius
International Trade ---- Government official
The objective of the GSP should be considered in parallel to the newly adopted Lisbon treaty paying specific attention to small vulnerable economies.

a company
Myanmar
Information Supply
No Comment

a company
Philippines
Agriculture and Aquaculture
What's the Lisbon Treaty? If by the People, for the People and of the people then it is OK.

a company
Qatar
Liquified Natural Gas
An appropriate study may be needed to address this issue. As a general principle, we support the alignment of the Lisbon treaty objectives of the promotion of free and fair trade, the abolition of restrictions on international trade, and the lowering of customs and other trade barriers, together with the objectives of reducing poverty and promoting sustainable development and good governance amongst developing nations.

a citizen
Republic of Macedonia
Customs
Yes

a business association

Spain

Fisheries

Yes, they should. Regarding the fishing industry and according to the objectives of the Lisbon Treaty, it is important to introduce the goal of supporting and encouraging investments in developing countries.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 4. Absolutely not. We see the question as an illustration to our answer of Q3.

other

Switzerland

Policy research and negotiation assistance ---- International organization

See Q2 and Q3

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

Yes. For the sake of consistency, stability and to enhance the effectiveness and attractiveness of the scheme, the objectives of the Union's trade policy under the Lisbon Treaty ought to be reflected in the new GSP to reiterate the EU's commitment to the contribution to the harmonious and development of world trade. Article 206 of the Lisbon Treaty on Specific objectives of trade policy provides that: "....., the Union shall contribute, in the common interest, to the harmonious development of world trade, the progressive abolition of restrictions on international trade and on foreign direct investment, and the lowering of customs and other barriers." Thus, under the new scheme, among others, the objectives should focus more on the progressive abolition of restrictions on international trade and the lowering of customs duties and other barriers.

a citizen

UK

Private

Yes

a citizen

UK

Construction

No

a citizen

UK

Economic research

No.

a company

UK

Import and Distribution

no

other

UK

Multi sector trade union - public services, manufacturing and commercial services ---- trade union

GMB believes that the objectives must put a clear and solid focus on the promotion of the model of a social market economy through sustainable development objectives in line with the aims of the Lisbon Treaty.

a business association

United Kingdom

Seafood importation
No comment

a no profit organisation
United Kingdom
animal welfare
See Question 2.

a no profit organisation
United Kingdom
Representing workers in all sectors in the UK
Article 21 of the Lisbon Treaty states that the Union's action on the international scene shall be guided by the principles which have inspired its own creation, development and enlargement, and which it seeks to advance in the wider world: democracy, the rule of law, the universality and indivisibility of human rights and fundamental freedoms, respect for human dignity, the principles of equality and solidarity, and respect for the principles of the United Nations Charter and international law. Trade policy must reflect these high ideals, including action in relation to the GSP.

Q5 : Do you consider that GSP could contribute to address the challenges of the 21st century such as climate change and food security? Do you see ways to take account of these challenges in the next GSP regulation ?

a business association
Argentina
Argentine Oil Industry Chamber
Yes. The new GSP scheme may contribute to the challenges of climate change by promoting trade of "eco friendly" products through special tariff benefits - duty free access- i.e. organic products certified under the EU legislation or biofuels under the Renewable Energy Directive (RED). Consequently, it would be important to identify objective parameters to define this kind of products.
The EU must also make easier under GSP scheme trade of multi-purpose products for food, feed and energy, like soybean crushing products (soy meal for feed use, soybean oil as food and soybean biodiesel as energy). In this sense, the EU should introduce a new approach as a GSP value chain policy, meaning that all the products from the raw material to the last edible or not edible product should be considered with a preferential treatment under GSP (free duty).
A policy like this will improve sustainable development with the introduction of industrial practices in developing countries in favor of climate change, improvement of employment, new green technologies at farm and processing level and food security goals.

a business association
Argentina
Argentine Biofuels Chamber
Yes. The new GSP scheme may contribute to the challenges of climate change by promoting trade of "eco friendly" products through special tariff benefits - duty free access- i.e. organic products certified under the EU legislation or biofuels under the Renewable Energy Directive (RED). Consequently, it would be important to identify objective parameters to define this kind of products.
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A policy like this will improve sustainable development with the introduction of industrial practices in developing countries in favor of climate change, improvement of employment, new green technologies at farm and processing level and food security goals.

a business association

Argentina

Rosario Board of Trade

Yes. The new GSP scheme may contribute to the challenges of climate change by promoting trade of “eco friendly” products through special tariff benefits - duty free access- i.e. organic products certified under the EU legislation or biofuels under the Renewable Energy Directive (RED). Consequently, it would be important to identify objective parameters to define this kind of products.

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A policy like this will improve sustainable development with the introduction of industrial practices in developing countries in favor of climate change, improvement of employment, new green technologies at farm and processing level and food security goals.

a business association

Argentina

Buenos Aires Grain Exchange

Yes. The new GSP scheme may contribute to the challenges of climate change by promoting trade of “eco friendly” products through special tariff benefits - duty free access- i.e. organic products certified under the EU legislation or biofuels under the Renewable Energy Directive (RED). Consequently, it would be important to identify objective parameters to define this kind of products.

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A policy like this will improve sustainable development with the introduction of industrial practices in developing countries in favor of climate change, improvement of employment, new green technologies at farm and processing level and food security goals.

a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

Yes. The new GSP scheme may contribute to the challenges of climate change by promoting trade of “eco friendly” products through special tariff benefits - duty free access- i.e. organic products certified under the EU legislation or biofuels under the Renewable Energy Directive (RED). Consequently, it would be important to identify objective parameters to define this kind of products.

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A policy like this will improve sustainable development with the introduction of industrial practices in developing countries in favor of climate change, improvement of employment, new green technologies at farm and processing level and food security goals.

a business association

Argentina

Bahia Blanca Grain Exchange

Yes. The new GSP scheme may contribute to the challenges of climate change by promoting trade of “eco friendly” products through special tariff benefits - duty free access- i.e. organic products certified under the EU legislation or biofuels under the Renewable Energy Directive (RED). Consequently, it would be important to identify objective parameters to define this kind of products.

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A policy like this will improve sustainable development with the introduction of industrial practices in developing countries in favor of climate change, improvement of employment, new green technologies at farm and processing level and food security goals.

a no profit organisation

Argentina

Export services

Yes. The new GSP scheme may contribute to the challenges of climate change by promoting trade of “eco friendly” products through special tariff benefits -duty free access- i.e. organic products certified under the EU legislation or biofuels under the Renewable Energy Directive (RED). Consequently, it would be important to identify objective parameters to define this kind of products.

The EU must also make easier under GSP scheme trade of multi-purpose products for food, feed and energy, like soybean crushing products (soy meal for feed use, soybean oil as food and soybean biodiesel as energy). In this sense, the EU should introduce a new approach as a GSP value chain policy, meaning that all the products from the raw material to the last edible or not edible product should be considered with a preferential treatment under GSP (free duty).

A policy like this will improve sustainable development with the introduction of industrial practices in developing countries in favor of climate change, improvement of employment, new green technologies at farm and processing level and food security goals.

a no profit organisation

Argentina

Research on international Negotiations

Yes. The new GSP scheme may contribute to the challenges of climate change by promoting trade of “eco friendly” products through special tariff benefits - duty free access- i.e. organic products certified under the EU legislation or biofuels under the Renewable Energy Directive (RED). Consequently, it would be important to identify objective parameters to define this kind of products.

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A policy like this will improve sustainable development with the introduction of industrial practices in developing countries in favor of climate change, improvement of employment, new green technologies at farm and processing level and food security goals.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Si, entendemos que el SGP podría transformarse en una herramienta valiosa en pos de hacer frente a los nuevos desafíos. Con respecto al cambio climático, propiciamos que la UE considere la posibilidad de incluir dentro de la lista de productos NO sensibles a aquellos “amigables con el ambiente” como forma de incentivar su producción en los PED. Cabe destacar que aún no se han acordado a nivel internacional criterios/indicadores para identificar bienes “amigables con el ambiente”.

Atento a ello se debería considerar la posibilidad de entablar canales de diálogo con cada uno de los países beneficiarios para consensuar los “bienes ambientales” a incluir dentro de las listas de productos No sensibles a fin de asegurar que se ajusten a las necesidades de los PED.

Por otro lado, para enfrentar el desafío de la “seguridad alimentaria” deseamos destacar que Argentina considera que es imprescindible eliminar todas las políticas distorsivas llevadas adelante por los países desarrollados en el sector agropecuario. La experiencia muestra que su aplicación no tiene como resultado un mejor acceso a los alimentos.

Por el contrario, estas políticas distorsionaron los precios, provocando que numerosos agricultores de los PED, especialmente aquellos que practican la agricultura familiar, quedaran a la vera del mercado no pudiendo competir con los precios resultantes de los elevados beneficios recibidos por los agricultores de los países desarrollados.

Atento a ello, entendemos que la reducción de aranceles a la importación de productos agropecuarios, a través de su inclusión dentro de las listas de productos No sensibles, podría contribuir a hacer frente a los desafíos que enfrenta la comunidad internacional en materia de “seguridad alimentaria”.

a business association

Argentina

Argentine Soybean Chain Association

Yes. The new GSP scheme may contribute to the challenges of climate change by promoting trade of “eco friendly” products through special tariff benefits - duty free access- i.e. organic products certified under the EU legislation or biofuels under the Renewable Energy Directive (RED). Consequently, it would be important to identify objective parameters to define this kind of products.

The EU must also make easier under GSP scheme trade of multi-purpose products for food, feed and energy, like soybean crushing products (soy meal for feed use, soybean oil as food and soybean biodiesel as energy). In this sense, the EU should introduce a new approach as a GSP value chain policy, meaning that all the products from the raw material to the last edible or not edible product should be considered with a preferential treatment under GSP (free duty).

A policy like this will improve sustainable development with the introduction of industrial practices in developing countries in favor of climate change, improvement of employment, new green technologies at farm and processing level and food security goals.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Nein. Das sind nicht die Ziele des APS und es ist davor zu warnen, das System zu überfrachten und für "fremde Ziele" zu "missbrauchen". Schon jetzt ist das APS vor allem für Lieferanten (und Behörden) in Entwicklungsländer schwer verständlich. Ausweitungen auf weitere Themen würden aber auch den EU-Importeur ungebührlich belasten, da er kaum Möglichkeiten der Kontrolle hat und generell das System unüberschaubar und damit weniger effektiv machen.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

ITEMS ELIGIBLE FOR GSP MUST NOT GET ANY OTHER FISCAL SUPPORT EG CASH INCENTIVE FROM THE EXPORTING GOVERNEMENT. THAT MONEY SHOULD BE DIVERTED FOR FOOD SECURITY OR SUPPORT TO POPULATION ALREADY SUFFERING FROM CLIMATE CHANGE

a business association

Belgium

International trade in flowers

At the moment, we believe that the GSP should focus on trade and trade related-issues only.

a business association

Belgium

Renewable energies

GSP tariff preferences to Argentina, Indonesia and Malaysia benefit to countries opposed to trade openness and furthermore to the EU trade policy goal to abolish export taxes worldwide. Indonesia contributed to the failure of the July 2008 WTO ministerial conference by requesting more tariffs cuts from developed countries, while rejecting significant tariff cuts for developing countries. Indeed, Argentina, Indonesia and Malaysia were asking for flexibilities in tariff cuts (Special Safeguard Mechanism, Special Products, Tropical Products, Tariff Escalation, etc.) that could allow developing countries to charge customs duties higher than before the negotiations , which seems at least questionable in the context of negotiations intended to liberalise global

trade. In addition to being one of the strongest opponents to an agreement liberalising global trade during the WTO ministerial in July 2008, Argentina is currently regarded as one of the main obstacles to an EU-Mercosur bilateral free-trade agreement despite the support of the EU and Brazil .

In addition, Argentina maintains a regime of differential export taxes (DETs). Although differential export taxes might be out of the scope of the definition of “subsidy” in WTO law, there is a wide consensus on the fact that they constitute support measures to the Argentine biodiesel industry .

The abolition of all export taxes has been advocated by the EU with a view to ensure a level-playing field between economic operators and strongly opposed by Argentina, Indonesia and Malaysia .

This EU trade policy goal to abolish export taxes worldwide is reflected in most trade policy arenas, including bilateral trade negotiations with Mercosur, Ukraine and the ASEAN. Despite this EU policy goal to ban export taxes , the latest draft WTO agreement only mentions the possibility to include provisions regulating export taxes .

Argentina is the third largest soybean producer with 18% of the world production and also the third soybean oil processor with 18% of global production, but ranks as the first exporter (45% of the global export market for soybean oil) because 90% of its production is exported . 80% of the Argentine soybean is grown in the Santa Fe region, which is close to the Rosario and San Lorenzo port facilities - the export gates to the EU and the US. Biodiesel plants are located along the river Parana, ensuring easy logistics.

Currency devaluation, biotechnology use, improved agricultural management and the differential export taxes have contributed to the development of the Argentine biodiesel. “In just under four years Argentina has made an astonishing catch-up with some of the more mature biodiesel producers such as Germany”, one of the EU Member States most affected by B99 imports over the last few years, “and the prospects for the sector have never been brighter” .

In the view of EBB, there is no ground for further extending the GSP coverage of the fastest-growing biodiesel industry in the world, which has become the main exporter to the EU. Similarly, Indonesia and Malaysia produce 80% to 85% of the world’s palm oil and their exports represent 90% of the global trade, because 70% of their production is exported. The size and maturity of their palm oil sector has justified their graduation from the GSP for section III for ‘Animal and vegetable fats and oils’.

The 21st century will be characterised by the strengthening of large developing countries, which has been reflected in WTO negotiations where they seek maximal flexibilities whereas they demand higher concessions from developed countries.

In consequence, the GSP would address the challenges of the 21st century by removing the trade preferences for those who will be the main beneficiaries of world trade during this century.

a business association

BELGIUM

NITROGEN FERTILIZERS

Yes the GSP scheme should address both climate change and food security. On climate change commitments to international norms and standards must be adhered too in order to qualify for GSP.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

The countries that should benefit most from the GSP - that is the poorest countries - only contribute very modestly to global greenhouse gas emissions which contribute to climate change. It would not make sense to impose climate change obligations on these countries that have little or no responsibility in this affair. For emerging countries, it is expected that they will contribute to a global climate change agreement under negotiation in the UN framework. The food security challenges in developing countries will be better solved through intensified cooperation between the EU and countries that face food shortages. Simple improvements to agrarian techniques and logistics would probably contribute more to food security than trade preferences.

a business association

Belgium

representation of interests of the EU food and drink industry

The EU is the largest importer of products from developing countries, particularly so in the agri-food sector. In order to strengthen its contribution to development objectives, CIAA agrees that the system needs to be adjusted based on recent international economic developments and meet specific 21st century challenges, such as food security (e.g. by measures that encourage production diversification).

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance In our view, it is not consistent to put on EU industry so many challenges (namely with ETS and also a series of environmental constraints) with the risk of carbon leakage and on the other boost those economies which are not at all committed to environment and/or health. Trade preferences should be withdrawn for those countries/industries which are blatantly not respecting these -international - targets.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

While in principle these goals are complementary to the global strategy behind the GSP, the limitations of the system should also be recognised. GSP policy should remain focused on economic development with respect for core labour and human rights standards being implicit for inclusion in the system. Expanding it considerably to “address the challenges of the 21st Century” risks losing sight of this.

a business association

Belgium

Trade association: Man-made fibres

N/C

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

Cf. reply to Q3 - The best way to take account of the 21st century challenges is to re-consider the list of beneficiary countries so as to focus preferences not only on those countries which need them most but also where these preferences can have the most effective impact. It is illusory for instance to believe that tariff preferences granted by the EU in the GSP context could result in a change of climate change policy in China. Objectives must be consistent and compatible with what a tariff preference can actually achieve.

a business association

Belgium

Textiles & Clothing

The new GSP regime should also take into consideration recent changes in the economic and trade environment and accommodate societal needs. Upcoming issues like trade facilitation, limited access to raw materials, Intellectual Property Rights protection and enforcement and FDI safeguard should be rightfully sheltered. A further emphasis should be put into achieving and upholding sustainable development practices.

a business association

Belgium

EUROCHAMBRES, the Brussels-based Association of European Chambers of Commerce and Industry EUROCHAMBRES is the sole European body that serves the interests of every sector and every size of European business and the only one so close to business. EUROCHAMBRES has member organizations in 45 countries representing a network of 1,700 regional and local Chambers with over 19.8 million member companies. Chamber members employ over 120 million employees.

We do not believe that the objectives of the GSP should be extended to food security, climate change etc. From both the importers and the perspective of the developing countries, the system is too complicated already and would become less stable, predictable and objective if the EU included more requirements tied to environment and climate change, food security etc.

a business association

Belgium

The CEFS (Comité Européen des Fabricants de Sucre) represents all European sugar manufacturers and refiners among the European Institutions (Council of Ministers, European Commission, European Parliament, Economic and Social Committee, etc.) and among different international organisations (FAO, WTO, etc.). Since December 2009 CEFS is registered as interest representative (Identification number in the register: 49679062863-35).

A. GSP can contribute as a further incentive for developing countries to grow in a sustainable way and by doing so to contribute to the international fight against Climate Change. A major international fund with the aim to help those developing economies to meet Greenhouse Gas (GHG) emission targets is under preparation (it was one of the main points discussed at the Copenhagen Summit end of 2009). GSP preferential treatment could therefore integrate those new targets as a further encouragement for those developing countries to timely implement the appropriate Climate Change policies. This could also help to avoid the undesirable phenomenon of 'Carbon leakage' whereby industrial production (and its associated GHG emissions) is re-located to countries with lower standards with the regrettable end effect of increasing overall Global emissions. With the new ETS (Emissions Trading System), which will apply in Europe as of 2013, the risk of carbon leakage will be greater than ever.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

No. Already in its current shape, the GSP is not easy to understand for economic operators. This goes especially for exporters (producers) in the beneficiary countries. Administrative problems like verifying the correctness of Form A certificated add to these difficulties. EuroCommerce is afraid that the inclusion of additional complex issues like food security would make the GSP more complicated and, hence, less effective.

a business association

Belgium

Representing the foreign trade interests of European retail trade

As already mentioned, the role of GSP should not be overestimated. GSP cannot be an instrument to make a contribution for solving the problems of the 21st century.

a citizen

Belgium

Finance

Yes

a company

Belgium

Import of food items

Whether it " could " remains an open question. Whether it " should " must be answered with a YES... But isn't this not creating a major contradiction ?

a no profit organisation

Belgium

Agricultural and Agrifood Trade

CELCAA believes that GSP scheme is not the appropriate framework to address food security and climate change. For trade operators, especially in third countries, the current GSP Regulation is already complicated to understand and to implement. We believe that the integration of such issues would make the GSP more complex for operators and would add inappropriate administrative burden. However, under the Aid for Trade support, capacities in phytosanitary and veterinary services should be built up in developing countries in order to enable to satisfy European SPS standards.

a no profit organisation

Belgium

Economic justice

GSP can contribute to food security and the fight against climate change if it preserves the capacity of developing countries to protect their agricultural sector from the influx of cheap agricultural products from developed countries and if it gives developing countries the possibility to access climate change mitigating technology easily.

a no profit organisation

Belgium

trade

food security and climate change are intrinsic conditions for trade

other

Belgium

Representing working people in all sectors throughout Europe ---- European Trade Union Confederation

The EU Commission should include criteria relating to these areas in the Regulation. This would go towards meeting the ETUC's often-repeated request generally for improved coherence among Commission DGs, notably trade, external relations, development, energy and climate change, environment, and employment and social affairs.

other

Belgium

Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)

The GSP, particularly GSP+, should encourage adherence to agreements related to environmental protection and sustainability. In light of today's global climate concerns, these requirements are modest compared to the challenges ahead. In addition the GSP should encourage and incentivize developed countries to contribute more towards the development of sustainable sectors of industry in developing countries.

other

Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)

The EU Commission should include criteria relating to these areas in the Regulation. Improved coherence among Commission DGs, notably trade, external relations, development, energy and climate change, environment, and employment and social affairs is an important issue.

other

Belgium

advising our members, interest representation ---- Cefic

The GSP - as an instrument of customs law - does not offer an adequate, non-discriminatory approach to the granting of preferences to products, which can be associated with sufficient precision with environmental goals. Moreover, this instrument - which is already now difficult to handle - would become overly complex and unmanageable, especially for beneficiary countries. .

a no profit organisation

Bolivia

Exportaciones

Consideramos que temas como el cambio climatico y la seguridad alimentaria no deben formar parte de las regulaciones del SGP.

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

Yes. It could be made through preferential treatment and unrestricted opening of the European market for food products, textiles produced in developing countries

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

Los aspectos de cambio climático y seguridad alimentaria deben ser considerados en el próximo reglamento, siempre y cuando este aspecto no represente incrementar las exigencias y requisitos que debe cumplir Bolivia para acceder al mercado europeo.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

Yes. It could be made through preferential treatment and unrestricted opening of the European market for food products produced in developing countries

other

BOLIVIA

EXPORTS ---- Government representative

Yes

other

Bolivia

Government ---- Government Official

With regards to climate change, the GSP+ requires countries to implement among others, the Kyoto Protocol. Taking into account the current concerns that climate change has arisen they could be reflected in the requirements of the GSP, while taking into account the development needs of the beneficiary countries and the difficulties they may face in implementing related measures.

other

Bolivia

Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio

Consideramos que temas como el cambio climático y seguridad alimentaria no deben formar parte de la regulación del SGP.

a business association

Brazil

industrial sector

Yes. It's a consensus that the new challenges of this century should be dealt through further liberalization and not with protectionism. one way to contribute would be by extending the benefits of GSP to environmental goods, products related to clean technologies and renewable energy sources, and low carbon intensive products. More specifically, GSP could contribute to address challenges such as climate change and food security through the inclusion, respectively, of ethanol and different types of foods.

other

Brazil

Government ---- Ministry of External Relations - Federative Republic of Brazil

We understand that new and old challenges alike that are on the international agenda, such as climate change and food security, are of great importance to global development. Nevertheless, we believe that these issues are horizontal in nature and should be addressed in proper multilateral forums that allow for proper discussions on possible solutions. In any case, measures taken to face climate change challenges, including unilateral ones, should not constitute a means of arbitrary or unjustifiable discrimination or a disguised restriction on international trade, as stipulates Article 3.5 of the UN Framework Convention on Climate Change. In this context, such issues should not be the object of specific clauses of trade preferences programs.

a company

Cambodia

Export

It should but if so, it would add more burden to the LDCs to face new challenges with the climate change and food security regulations. It better to remain the current practice regulations.

a business association

Ecuador

Ecuadorian Exporters Federation

El SGP+ requiere que los países beneficiarios califiquen suscribiendo y aplicando de manera efectiva varias convenciones en temas ambientales que directa o indirectamente están vinculadas con el tema del cambio climático: - Protocolo de Montreal relativo a las sustancias que agotan la capa de ozono. - Convenio sobre la Diversidad Biológica. - Protocolo de Cartagena sobre Seguridad de la Biotecnología. - Protocolo de Kyoto de la Convención Marco de las Naciones Unidas sobre el Cambio Climático. - Convenio de Basilea sobre el control de los movimientos transfronterizos de los desechos peligrosos y su eliminación. - Convenio de Estocolmo sobre contaminantes orgánicos persistentes. - Convención sobre el Comercio Internacional de Especies Amenazadas de Fauna y Flora Silvestres. Desde esa perspectiva no se ve como necesario ampliar los condicionamientos del SGP, de hecho estos ya representan una carga considerable que los países beneficiarios asumen con responsabilidad. Por otro lado, la aplicación e implementación plena de los beneficios del régimen SGP puede ayudar a abordar temas como cambio climático y seguridad alimentaria con el mero hecho de apoyar a la reducción de la pobreza mediante la profundización de la cooperación técnica-económica.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

The GSP+ already includes several conventions on environment and climate change: - Montreal Protocol on Substances that Deplete the Ozone Layer - Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal - Stockholm Convention on Persistent Organic Pollutants - Convention on International Trade in Endangered Species of Wild Fauna and Flora - Convention on Biological Diversity - Cartagena Protocol on Biosafety - Kyoto Protocol to the United Nations Framework Convention on Climate Change With a view to fulfill environmental objectives, it is advisable to enhance to this field the conditions for granting the standard GSP, but avoiding to enhance the requirements already included in the GSP+, which already represent a considerable burden for the beneficiary countries. On the other hand, the GSP standard regime can help to approach matters like climatic change and food security, through the canalization of non reimbursable economic and technical co-operation, for example to help in the fulfillment of requirements of environmental standards for the export of goods.

a business association

Finland

Trade Policy

Yes, but mainly indirectly.

a business association

Finland

Pulp, paper, paperboard and wood products industries interest representation

The GSP can in its way contribute to the above mentioned global challenges.

a business association

France

Textile

For our sector the GSP could take account challenges like Intellectual Property Rights or consumers security..

a business association

France

Fishery products - Tuna

Include provision to favour taking on board of environmental issues by GSP beneficiary countries

a business association

Germany

Industry

The GSP - as an instrument of customs law - does not offer any adequate, non-discriminatory approach for a granting of preferences to products, which can be associated with sufficient precision with environmental goals. Moreover, this instrument - which is already now difficult to handle - would become overly complex and unmanageable, especially for beneficiary countries.

a company

Germany

chemical sector

Linking GSP preferences with climate change goals entails huge risks, since the GSP does not (and probably can not) offer any adequate, non-discriminatory approach for the granting of preferences to products, which can be associated with sufficient precision with environmental goals. Moreover, the GSP instrument - which is already now complex to handle - would become unmanageable, especially for beneficiary countries.

a company

Germany

Think-tank for European and international economy and governance

Yes, these subjects should be somehow included.

a company

Germany

No. Trade policy should not be linked with too many non-trade issues such as climate change.

a company

germany

chemical production

yes, definitely. Only in the case when we achieve the same production conditions worldwide we are able to fight against climate change and food security/safety. If we exchange highly polluting production in Europe against imports from highly polluting industries in developing countries we do not gain anything. The same is true for the safety of food (pesticide residues etc.)

a company

Germany

production of fine chemicals on request - toll manufacturer for fine chemicals

It will be an easy going: We have first to avoid that states have official or unofficial subvention of their products. Second we have to make sure that import taxes in third countries are mirrored by import barriers for products from such countries. This will create a level playing field in terms of trade barriers. Then, we have to make sure that productions sites that have potential to change the climate or food security are evaluated by external bodies resulting in the elimination of water or air pollution in the countries. Such efforts will support those development countries that have good ethics and standards and be in disfavor of those who violate global standards.

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

The GSP - as an instrument of customs law - does not offer any adequate, non-discriminatory approach for a granting of preferences to products, which can be associated with sufficient precision with environmental goals. Moreover, this instrument - which is already now difficult to handle - would become overly complex and unmanageable, especially for beneficiary countries. .

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

In the case of our sector, the environment and the food security are essential elements because have directly an effect on the final consumers since ensuring that products are fit for human consumption. Therefore, the EU should make sure the marketed products in the EU market, particularly imported products, obey the environmental and sustainability principles, as well as the hygienic-sanitary standards.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

In the case of our sector, the environment and the food security are essential elements because have directly an effect on the final consumers since ensuring that products are fit for human consumption. Therefore, the EU should make sure the marketed products in the EU market, particularly imported products, obey the environmental and sustainability principles, as well as the hygienic-sanitary standards.

a no profit organisation

India

Research in International Economic Relations

As argued in response to Q 2, the objective of the GSP should be kept simple: to increase export earnings and promote industrialization with the ultimate aim of reducing poverty. The EU has already loaded its programme with a number of non-trade-related objectives. It should not be further overloaded.

other

India

Higher Education ---- An Academic in a Central University, under the HRD Ministry, Government of India

By transferring appropriate eco-friendly technology ,protecting traditional knowledge and through a liberal agri- patenting system

a no profit organisation

Italy

Education and Research

Yes. For example by using the coexistence of different preferential regimes for ensuring extra advantages to products which are ecologically sustainable, or by using preferential tariff rates.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

Yes. See answer to Q3.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

No, we believe that climate change and food security are sufficiently addressed in the other forums/instruments. Current GSP+ already addresses main issues of sustainable development thus overloading of GSP with the new objectives would make the system inefficient and cumbersome.

a company

Malaysia

Textile

Yes

a company
Malaysia
Export Pepper
Yes

a company
Malaysia
Screw, Nut & Washer
Yes

a company
Malaysia
Manufacturing
Of course GSP can contribute to the food security. A company must be ISO or HACCP certified before they enter into Europe market and obtain an GSP. From this we can see that a company must improved themselves in the food security in order to obtain a GSP.

a company
Malaysia
Manufacturer of furniture
Yes.. I think so.

a company
Malaysia
Screw fastener manufacturer
Yes.

a company
Malaysia
Manufacturing
Not sure

other
Malaysia
International trade and industry ---- Ministry of International Trade and Industry Malaysia
Yes, GSP could contribute to challenges such as climate change and food securities. GSP is suggested to be more lenient to facilitate exporters in beneficiary countries for the distribution and easy access of food into European Union.

a citizen
Myanmar
obsearver
Yes, I do

a company
Myanmar
Information Supply
Yes it would contribute. Certain guidelines can be given to retain GSP status.

a company
Paraguay
oilseeds processing
Yes I do, there could be enrivonmental requirements that the exporters from developing countries must comply with such us use of renewal energy, effluent treatment, healthy working conditions, etc.

a company
Paraguay
Sugar and Alcohol

Yes

a company
Paraguay
manufacture of lumber
yes. Obligating buying forested and certified wood

a company
Philippines
Manufacturing of packaging products
No

a company
Philippines
Agriculture and Aquaculture
Yes, we should green the environment by planting not only ordinary trees but fruit trees. We have to consider producing high value crops rather than the traditional crops like rice, corn or cassava then support these endeavors with post harvest facilities, farm to market roads, irrigation, processing and marketing, etc.

a business association
Portugal
Textile and Clothing Industry
The new GSP regime should also take into consideration recent changes in the economic and trade environment and accommodate societal needs. Upcoming issues like trade facilitation, limited access to raw materials, Intellectual Property Rights protection and enforcement and FDI safeguard should be rightfully sheltered. A further emphasis should be put into achieving and upholding sustainable development practices.

a company
Qatar
Liquified Natural Gas
No comment.

a company
Qatar
Chemicals and Petrochemicals
Yes, food security.

a citizen
Republic of Macedonia
Customs
To some extent

a business association
Spain
Fisheries
We do consider that GSP could contribute to address the challenges of the 21st century, such as climate change and food security, but only if preferential tariff rates went along with the need for products and production processes in third countries to comply with the same environmental and social conditions required from Community products and production processes.

a business association
Sweden
The Association of Swedish Chambers of Commerce representing Swedish companies. The Swedish Chambers of Commerce are regional, independent, non-profit making organizations, funded by the members.
We do not believe that the objectives of the GSP should be extended to food security, climate change etc. From both the importers and the perspective of the developing countries, the

system is too complicated already and would become less stable, predictable and objective if the EU included more requirements tied to environment and climate change, food security etc.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 5. No. It is questionable to what degree if any GSP promotes trade; it is no chance what so ever that it can fix climate or any other policy in fashion at a certain point of time.

a no profit organisation

Sweden

RFSL, The Swedish Federation for Lesbian, Gay, Bisexual and Transgender Rights, is the main LGBT-organisation in Sweden with 29 branches all over the country, working with LGBT rights, LGBT health, operating counselling services, arranging social and cultural activities, working with education, facilitating international projects in cooperation with other stakeholders etc. RFSL is a member of ILGA - International Lesbian, Gay, Bisexual and Transgender Association.

It could also contribute to address the challenge of providing citizens of GSP-countries basic human rights in cases where there are a lack of basic human rights today. See answer upon question 23.

other

Switzerland

Policy research and negotiation assistance ---- International organization

Yes, a new GSP, when made permanent instead of automatic expiry after 3 years, could provide a legal basis to EU's commitment (Hong Kong Ministerial 2005) to eliminate all forms of agricultural export subsidies by 2013.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

No. Thailand considers that both climate change and food security should not be included in the GSP regulation because, to-date, they are on-going controversial issues for which are yet to be decided their most appropriate forum and/or international bodies e.g. the UN and/or WTO (as well as other appropriate international organizations). By addressing such challenges in the new GSP, it will only become more cumbersome and difficult to implement. Furthermore, it might effectively create new restrictions on Thailand and other beneficiary countries.

a citizen

UK

Private

Yes

a citizen

UK

Economic research

No: it is completely unsuitable as a tool for such objectives. Don't continue to pile more and more objectives onto a very blunt instrument that touches only the traded sectors of an economy.

a company

UK

Import and Distribution

yes. Economic incentives should be introduced that encourage ecologically sound processes, production or product.

a no profit organisation

UK

Development Education, campaigns + advocacy

The EU should eliminate all trade barriers to renewable energy technology coming from all GSP countries with the aim of stimulating the development of the home-grown renewables industry in DCs

other

UK

Multi sector trade union - public services, manufacturing and commercial services ---- trade union

Yes. The EU Commission should include criteria relating to these areas in the Regulation, but GMB believes that the EU Commission would have to support developments in this area across its Trade, Development, Energy, climate change, and Environment directorates to ensure coherence and maximization of scope to assist developing countries in these areas.

a business association

United Kingdom

Seafood importation

No. The addition of new requirements on the GSP system will reduce its efficiency by diverting effort away from its core objectives.

a no profit organisation

United Kingdom

animal welfare

Theoretically food security could be impacted by a programme that raises animal welfare and management standards to EU equivalence to enable a developing country to achieve export potential, IF such a programme was also linked to the re-investment of profitability into other sustainable good production projects in the country or local community in question.

This there may be potential for the GSP system where successful application of tariffs and quotas would trigger additional technical support through Aid for Trade, or Development which would deliver assistance in other areas of animal food production to get a developing country up to OIE standards.

These would not offer export opportunities to the EU but would still ensure better food hygiene, improve food security but also expand South-South export potential for the country concerned. Triggers in the GSP programme which result in de-graduation of preferences could be wived on a long term basis for those countries in such a programme.

This does not mean that the organisations support lower than EU animal welfare standards but we recognise that achieving OIE minimum standards is part of the journey towards better global standards.

a no profit organisation

United Kingdom

Representing workers in all sectors in the UK

The EU Commission should include criteria relating to these areas in the Regulation. This would go towards meeting the pressing need for improved coherence among Commission DGs, notably trade, external relations, development, energy and climate change, environment, and employment and social affairs.

a company

Uruguay

Exportacion de Miel , Cera y Propoleos organico y convencional

Las regulaciones actuales de la UE ya estan considerando fuertemente la seguridad alimentaria .

No veo como podria abordar el tema del cambio climatico

Q6: Does the parallel co-existence of different preferential regimes (for example GSP and a bilateral trade agreement) for imports into the EU from the same developing country support or hinder effective use of the preferences by that country? To what extent does the co-existence of parallel import regimes create other incoherences that need to be addressed?

a business association

Argentina

Argentine Oil Industry Chamber

Co-existence of different preferential regimes does not hinder effective use of preferences as long as a given product would only be levied with the lower duty - the biggest tariff preference - (see answer to Q. 13).

a business association

Argentina

Argentine Biofuels Chamber

Co-existence of different preferential regimes does not hinder effective use of preferences as long as a given product would only be levied with the lower duty - the biggest tariff preference - (see answer to Q. 13).

a business association

Argentina

Rosario Board of Trade

Co-existence of different preferential regimes does not hinder effective use of preferences as long as a given product would only be levied with the lower duty - the biggest tariff preference - (see answer to Q. 13).

a business association

Argentina

Buenos Aires Grain Exchange

Co-existence of different preferential regimes does not hinder effective use of preferences as long as a given product would only be levied with the lower duty - the biggest tariff preference - (see answer to Q. 13).

a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

Co-existence of different preferential regimes does not hinder effective use of preferences as long as a given product would only be levied with the lower duty - the biggest tariff preference - (see answer to Q. 13).

a business association

Argentina

Bahia Blanca Grain Exchange

Co-existence of different preferential regimes does not hinder effective use of preferences as long as a given product would only be levied with the lower duty - the biggest tariff preference - (see answer to Q. 13).

a no profit organisation

Argentina

Export services

Co-existence of different preferential regimes does not hinder effective use of preferences as long as a given product would only be levied with the lower duty -the biggest tariff preference-. The GSP and a Free Trade Agreement, for example, should work as complementary tools for granting preferential market access to the EU and different policy choices to support developing countries exports.

a no profit organisation

Argentina

Research on international Negotiations

Co-existence of different preferential regimes does not hinder effective use of preferences as long as a given product would only be levied with the lower duty - the biggest tariff preference - (see answer to Q. 13).

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Actualmente Argentina no cuenta con otro régimen preferencial más que con el SGP, aún así entendemos que la coexistencia de más de un régimen no debería menoscabar el uso efectivo de las preferencias en tanto y en cuanto el sistema asegure que el país exportador pueda optar por enviar el producto bajo el mecanismo que le asigne mayor preferencia arancelaria para el producto en cuestión.

Con respecto a la segunda consulta, entendemos que la coexistencia de más de un régimen preferencial no debiera resultar “incoherente” dado que todos ellos deberían tener el mismo objetivo: favorecer el comercio entre la UE y un tercer país a través de reducciones arancelarias.

En tal sentido, no encontramos incoherencias a priori y consideramos que si se establecen los mecanismos adecuados en los diferentes regímenes, no debiera haber mayores inconvenientes en asegurar un aprovechamiento integral de las preferencias arancelarias establecidas en el marco del SGP y las negociadas mediante acuerdos comerciales bilaterales.

a business association

Argentine

Argentine Soybean Chain Association

Co-existence of different preferential regimes does not hinder effective use of preferences as long as a given product would only be levied with the lower duty - the biggest tariff preference - (see answer to Q. 13).

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Da bei Inkrafttreten von (üblicherweise umfassenderen) bilateralen Präferenzen die APS-Präferenzen außer Kraft treten, sind uns keine Inkohärenzen bewusst. Das Abschließen eines FTA impliziert üblicherweise, dass dieses Land bereits einen wesentlichen Entwicklungsschritt gesetzt hat, kommt in den Genuss von umfassenden bilateralen Begünstigungen und sollte daher parallel von den APS-Begünstigungen entlassen werden.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

WHATEVER THE BILATERAL AGREEMENT GSP SHOULD REMAIN SUPREME AS IT IS THE MOST EASILY ACCESSIBLE RULE. ITEMS ALREADY GETTING SUPPORT NEED NOT BE ADDRESSED IN BILATERAL AGREEMENTS

a business association

Belgium

International trade in flowers

The general objective should be a system as simple and transparent as possible to better ensure the effective use of preferences by operators. Therefore, the co-existence of different preferential regimes should be limited as much as possible - see also our answer to question 13.

a business association

Belgium

Renewable energies

A new customs code for biodiesel was introduced in the 2008 Combined Nomenclature in order to clarify the classification of biodiesel and reflect its emergence as a commodity.

Since January 1st, 2008, “Fatty acid mono-alkyl esters, containing by volume 96,5% or more of esters (FAMAE)” fall under customs code 3824 90 91, which belongs to Chapter 38 for “Miscellaneous chemical products” and to Section VI “Products of the chemical and allied industry”.

With this classification as a chemical product, the EU indirectly applied a preferential tariff to biodiesel imports, motivated by the structural needs of a different sector: the chemical industry.

Indeed, the EU is part of the Chemical Tariff Harmonization Agreement (CTHA), signed on October 28th, 1991 in the context of the global trade negotiations (Uruguay Round) . This agreement was intended to decrease the tariffs for chemicals, in order to lower tariffs barriers in the globally integrated chemical sector. The CTHA, bringing tariffs in Chapter 38 down to 6.5%, was signed only by a limited number of developed countries and only modified their "Schedule of Concessions".

In so doing, the few developed countries having signed the CTHA deliberately lowered their customs duties without requesting reciprocity from other countries. It is thus fair to consider that the EU granted indirect trade preferences to all non-signatory countries, in particular to developing countries with a significant chemical industry. The Chapter 38 "Miscellaneous chemicals" is part of the products covered by the GSP, as opposed to products of chapters 10, 17, 27, 30, 47, 48 and 49.

The GSP classifies most chemical products as "non-sensitive", which implies that the tariff is fully removed, as opposed to "sensitive" products for which the tariff is merely cut by three percentage points. The customs code for biodiesel (3824 90 91) falls under the category "ex Chapter 38", for which the tariff is fully removed. In addition, despite EBB warnings, the EU Customs Code Committee cancelled the specific tariff suspension for palm oil to be processed into biodiesel and reintroduced the normally applicable non-preferential import duty for palm oil is 5.1% (CN code 1511909100) from July 1st, 2009. This indirect incentive is higher than the export tax levied by Indonesia on its palm oil exports.

This customs duty differential adds up to the Indonesian export tax and consequently Indonesia and Malaysia now have a respective incentive to produce biodiesel locally equivalent to 9.6% and 5.1% of the biodiesel price. A more comprehensive analysis can be found in the EBB position ref. 472/TRA/10 sent to TRADE-GSP-Consultation@ec.europa.eu last June 2nd, 2010.

a business association

BELGIUM

NITROGEN FERTILIZERS

The main problem can simply be confusion over the relevant trade preferences. When a Free Trade Area preference exists it would seem logical to cancel the GSP preference. In reality with an FTA under Association or Partnership and Association agreements the EU tariff is fixed at zero anyway.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

Co-existence of different preferential regimes should be avoided as much as possible. A country with which the EU has concluded an FTA or EPA should be excluded from the GSP. Preferential agreements should offer at least as good and as far as possible much better trade benefits than the GSP.

a business association

Belgium

representation of interests of the EU food and drink industry

For the sake of simplicity and coherence, preferential tariffs resulting from GSP, and a Free Trade Agreement (FTA) concluded by a specific country, should not coexist. Such a change in the system could also encourage emerging countries, most concerned by the possibility of graduation, to conclude an FTA and therefore benefit from more stable and long-term preferences. A smooth transition from GSP to preferential access under an FTA should avoid difficulties for raw material importers in Europe.

a business association

Belgium

International trade

The general objective should be a system as simple and transparent as possible to better ensure the effective use of preferences by operators. Therefore, the co-existence of different preferential regimes should be limited as much as possible - see also our answer to question 13.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance
It should be ensured that countries which have concluded a FTA are prevented from using GSP.
Those countries should be excluded from GSP as soon as tariff dismantling is taking place.

a business association

Belgium

Wood products

The system is too complicated. One international system could make trade rules more comprehensive. Moreover, it may create structural imbalances: If the EU lowers its tariffs through the GSP and GSP+ and EBA, but other countries don't; the benefiting countries are likely to (re-)orient their exports towards the EU, instead of intensifying trade in general.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

We do not agree that the use of different preferential regimes hinders the use of preferences or creates incoherencies in trade relations. We see GSP as a first step towards the building of a joint-interest trade relationship between developing countries and the EU. Bilateral trade agreements are the second complementary step in bringing those trade relations to the next level. However advantages that existed under GSP should not be removed by an FTA, and the latter should provide for either the equivalent or enhanced preferences for the countries concerned.

a business association

Belgium

Trade association: Man-made fibres

A bilateral trade agreement is preferred assuming double transformation of textiles and clothing and a symmetrical dismantling of tariffs

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

Co-existence of different preferential regimes should be reduced/avoided as much as possible. The list of GSP beneficiaries should be simplified accordingly. This would bring more transparency to trade conditions between EU and third countries and would facilitate/encourage recourse to preferences as they would be univocally identified. For instance, a country with which the EU has concluded an FTA should be excluded from the GSP list upon full implementation of tariff dismantling. EPA countries should also be excluded from the GSP list inasmuch as they are granted free access to the EU market.

a business association

Belgium

Textiles & Clothing

The existence of a bilateral trade agreement implies in principle that market access conditions are substantially improved for the countries concerned particularly in terms of Tariffs. For this reason the objectives behind the GSP are no longer valid and the regime should no longer apply in these cases. The existence of parallel regimes should be avoided at all costs as they are a source of uncertainty and disruption among business operators especially in sensitive matters such as Rules of Origin.

a business association

Belgium

EUROCHAMBRES, the Brussels-based Association of European Chambers of Commerce and Industry
EUROCHAMBRES is the sole European body that serves the interests of every sector and every size of European business and the only one so close to business. EUROCHAMBRES has member organizations in 45 countries representing a network of 1,700 regional and local Chambers with over 19.8 million member companies. Chamber members employ over 120 million employees.

The co-existence of parallel frameworks is not a problem for the companies as a whole. The company seek the information they need about the preferential advantages in the TARIC-

system, adjusts to the rules that are most favourable and produces the documents that are needed. The problem for the companies is when the rules of origin not are simple and predictable and this has to be changed. It is crucial for the industry to get accurate information early on to make necessary changes in their import procedures.

a business association

Belgium

The CEFS (Comité Européen des Fabricants de Sucre) represents all European sugar manufacturers and refiners among the European Institutions (Council of Ministers, European Commission, European Parliament, Economic and Social Committee, etc.) and among different international organisations (FAO, WTO, etc.)-Since December 2009 CEFS is registered as interest representative (Identification number in the register: 49679062863-35). .

A. The preferences granted by Free Trade Agreements (FTAs) to some developing countries should not undermine the preferences given to LDCs through the Everything But Arms (EBA) initiative or to ACP countries through the Economic Partnership Agreements (EPAs). In particular concerning sugar, the EU production quotas and domestic European consumption are remaining globally stable, if the level of sugar imports into the EU is constantly increasing and exceeds a certain level above which the European market can't absorb it, the sugar Common Market Organization (CMO) will be undermined, as well as the preferences granted to LDCs and ACPs.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

At present, we are not aware of any such incoherences that would need to be addressed.

a business association

Belgium

Representing the foreign trade interests of European retail trade

The co-existence of different preferential regimes is not desirable. Countries benefiting from bi-lateral trade agreements should be excluded from GSP, except where GSP advantages are bigger.

a company

Belgium

Import of food items

Yes : uncertainty for importers but / and also creating loopholes for non-bona-fide importers, with the sol aim to enrich themselves

a no profit organisation

Belgium

Agricultural and Agrifood Trade

The co-existence of different preferential regimes for the same country can mislead agri-food trade operators and lead to a certain confusion as regards to the appropriate applicable trade regime to apply. It is specifically the case for products which are covered by different trade regimes for the same country. CELCAA therefore calls for a clear indication of the trade regime to be applied and would welcome a more coherent approach with the use of a single type of documentation to be provided under the different trade regimes.

a no profit organisation

Belgium

trade

NO

a no profit organisation

Belgium

COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

The coexistence of parallel agreements is a source of confusion as the applicable trade regime is not always easily recognizable. COCERAL asks for a clear indication of the trade regime to be

applied, especially when talking about products which are not covered by multiple trade regimes for a given country. More coherence would additionally be ensured through the use of a single type of documentation to be provided under the different trade regimes.

other

Belgium

Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)

EBCA does not object to the coexistence of parallel import regimes. However it should not prevent the establishment of a single, simplified and standard rule of origin system. The absence of such a system undoubtedly hinders effective use of preferences and should be addressed in any review of the GSP.

other

Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)

When there's a parallel agreement, it's very important for CSC as a trade union, that social clauses and conditions are as sharp in an FTA as in the GSP scheme. An FTA undermining the social and sustainable development goals of the GSP(+) scheme is an abusive distortion of GSP.

other

Belgium

advising our members, interest representation ---- Cefic

The parallel co-existence of different systems creates unnecessary administrative hurdles and causes confusion. In order to ensure workability and transparency, countries which have concluded free trade agreements with the EU cannot be GSP beneficiaries (any longer). Bilateral agreements are always preferable to unilateral tariff preferences. But then, it must be ensured that free trade agreements cover all products and do not leave any gaps.

a no profit organisation

Belgium, Brussels

leather sector. COTANCE represents interests of National Associations of Tanners and Dressers

- The parallel co-existence of GSP regime and FTAs raises the question on which one of the regimes contributes more to the development. The fact that ten largest GSP users are also negotiating FTAs suggests that FTAs could potentially address better the needs of these developing countries. In case of FTAs negotiating countries, the number of preferences given under the GSP should be reviewed and substantially reduced. Additionally it is important that the Commission keeps in mind the problems that arose with regard to the GSP regime and addresses them within FTA negotiations (e.g. access to raw materials)

a no profit organisation

Bolivia

Exportaciones

La base mínima de un acuerdo comercial no debería ser menor a las preferencias otorgadas en el SGP, por lo que si se firma otro acuerdo este prevalecería automáticamente sobre el SGP.

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

There should not be any difficulty, since the beneficiary country would apply the most beneficial regime for their exports.

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

Las preferencias mínimas a considerar en un acuerdo comercial deben ser las otorgadas en el SGP, en caso de firmar un acuerdo prevalecería automáticamente sobre el esquema SGP.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

There should not be any difficulty, since the beneficiary country would apply the most beneficial regime for their exports

a no profit organisation

Bolivia

industry

There should not be parallel trade regimes for a beneficiary country, it only creates incoherences, troubles and doubts.

other

BOLIVIA

EXPORTS ---- Government representative

Sometimes, import regimes have stoped imports to grow because of too heavy rules.

other

Bolivia

Government ---- Government Official

My country does not have a bilateral trade agreement, since they tend to include other issues besides trade that are sensible to us, like intellectual property, public procurements, investment rules and trade in services, therefore we prefer GSP as a mean to promote development through trade.

other

Bolivia

Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio

Consideramos que la base mínima de un acuerdo comercial no debería ser menor a las preferencias otorgadas en el SGP por lo que si se firma otro acuerdo este prevalecería automáticamente ante el SGP.

a business association

Brazil

industrial sector

More than one preferential regime allows better access to international markets as they can complement one another. Despite the inherent complexity of using various systems, GSP should act primarily as a factor that enhances the developing countries' exports, and, furthermore, as a platform of free trade between the beneficiary countries and EU.

other

Brazil

Government ---- Ministry of External Relations - Federative Republic of Brazil

Trade agreements seek to increase and facilitate trade among signatory countries. In the case where a country is beneficiary to both preferential and bilateral trade agreements, we suggest the establishment of a convergence chronogram between both agreements, where the most favorable position to the beneficiary country prevails. In the case of new agreements, such as the Mercosur-EU negotiations, liberalization schemes should depart from GSP levels for EU imports, so that new market access generated by the agreement is meaningful.

a company

Cambodia

Export

No comment.

other

Colombia

Tourism and Trade (Import-Export) ---- Government of Colombia

Colombia believes that the disadvantages are due to administrative customs and for this reason, we approve the consolidation of the benefits of the GSP in trade agreements just like the GSP regulations and just like it was the case with the EU offer which consolidated these benefits in the recent negotiation of the Trade Agreement between the EU and Colombia.

a business association

Ecuador

Ecuadorian Exportes Federation

El Artículo 3.2 del Reglamento 732/2008 se refieren a las condiciones para el retiro de las preferencias contempladas en el SGP, en los casos en que un país o grupo de países suscriban acuerdos comerciales con la Unión Europea de esa manera se solventarían los problemas que se presenten respecto de la coexistencia de regímenes que puedan generar inconsistencias. Sin embargo, los agentes comerciales y exportadores ecuatorianos mantienen expectativas de que las disposiciones relativas a la acumulación de origen se amplíen o mejoren con la profundización de acuerdos comerciales por parte de la UE. Cual quier nueva legislación que entre en vigencia debe ampliar o mejorar las disposiciones sobre acumulación contenidas en el Reglamento No.2454/93.

a business association

Ecuador

Tuna Industry

I don't think that parallel co-existence of different preferencia regimes hinder effective use of the preferences. There are no incoherences.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

In order to avoid the co-existence of parallel import regimes which may generate inconsistencies, paragraph 2 of article 3 of the Regulation 732/2008 already states clearly the conditions for the withdrawal of the preferences included in the GSP, for the case of a country or a group of countries which have signed trade agreements with the European Union. A matter of essential interest for Ecuador is the maintenance of the conditions of cumulation of origin contained in the Regulation 2454/93, which implies to include in that Regulation the possibility of cumulation of origin with countries of the region having concluded trade agreements with the European Union.

a business association

Finland

Trade Policy

FTAs should replace other preferential regimes.

a company

Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.

Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products

It is complicated for business when there are several parallel regimes.

a business association

France

MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies

MEDEF considers that the future scheme should prevent countries that have concluded an FTA or an EPA with the EU from using the GSP. The cumulation of origin, especially regarding the GSP+ rules, has to be clarified. MEDEF is particularly concerned with the risk of abuse or embezzlement of preferential access given to GSP+ countries that have a common union or an economic zone with non GSP or GSP neighbouring countries: EU should strengthen its custom controls to check that non GSP products or non-GSP+ products will not transit by GSP or GSP+ countries to gain to preferential access to EU market.

a business association

France

Textile

The beneficiary country has finally two possibilities to export to EU even if it doesn't support effective use of GSP it encourages this country in developing his trade.

a business association

France

Fishery products - Tuna

If transition has to occur from GSP regime to FTA provisions, it should be arranged in a smooth manner for operators in order to avoid trade disruptions

a business association

Germany

Industry

The parallel co-existence of different systems creates unnecessary administrative hurdles and causes confusion. In order to ensure workability and transparency, countries which have concluded free trade agreements with the EU cannot be GSP beneficiaries (any longer). Bilateral agreements are always preferable to unilateral tariff preferences. But then, it must be ensured that free trade agreements cover all products and do not leave any gaps.

a company

GERMANY

PHARMA/CHEMICALS

We are supporting the idea that the parallel co-existence of different systems creates unnecessary administrative hurdles and causes confusion. In order to ensure workability and transparency, countries which have concluded free trade agreements with the EU cannot be GSP beneficiaries (any longer). Bilateral agreements are always preferable to unilateral tariff preferences. However, it must be ensured that free trade agreements cover all products and do not leave any gaps.

a company

Germany

chemical sector

The parallel co-existence of different systems creates unnecessary administrative hurdles and causes confusion. In order to ensure workability and transparency, countries which have concluded free trade agreements with the EU cannot be GSP beneficiaries (any longer). Bilateral agreements are always preferable to unilateral tariff preferences. But then, it must be ensured that free trade agreements cover all products and do not leave any gaps.

a company

Germany

Think-tank for European and international economy and governance

This is micro-economic problem or one which can be managed by all related consulting or state institutions (e.g. customs office). But these should know also about it. In our opinion, further dissemination by Internet should be supported.

a company

Germany

We think that the co-existence of the different regimes is justified as both systems have different approaches and targets. This means that the respective countries should be able to choose according to their needs (graduated versus non-graduated sectors). In our view, the parallel co-existence of e.g. GSP and an FTA should not hinder the country in question to use the most advantageous preferences. Nevertheless we understand that the possible complexity (e.g. different rules of origin, different product coverage) could hamper the country to identify the most beneficial import regime. Capacity building measures might be needed to assist developing and least developed countries and their exporters in this regard. Of course the size and type of the exporter (SME versus multinational company) makes a big difference with regard to sufficient resources and knowledge needed.

a company

Germany

production of fine chemicals on request - toll manufacturer for fine chemicals

hinder. Make global rules and policies.

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

The parallel co-existence of different systems creates unnecessary administrative hurdles and causes confusion. In order to ensure workability and transparency, countries which have concluded free trade agreements with the EU cannot be GSP beneficiaries (any longer). Bilateral agreements are always preferable to unilateral tariff preferences. But then, it must be ensured that free trade agreements cover all products and do not leave any gaps.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

In order to avoid duplication and for the sake of coherence of the Community commercial policy, a beneficiary country should not benefit from both GSP and a trade agreement, if that agreement covers at least all the preferences provided by GSP for that country.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

In order to avoid duplication and for the sake of coherence of the Community commercial policy, a beneficiary country should not benefit from both GSP and a trade agreement, if that agreement covers at least all the preferences provided by GSP for that country.

a no profit organisation

India

Research in International Economic Relations

Parallel co-existence of different preferential regimes can only cause confusion particularly when the preferential treatment and rules of origin are different under the two schemes. It is bad from the perspectives of importers, exporters as well as the customs officials.

other

INDIA

TRADE POLICY ---- GOVERNMENT OF INDIA

Most of the preferential agreements adopt a mix of twin criteria (i.e. tariff heading change and/or value addition) for determining the origin depending on the nature of the product. There are many products where it is difficult to meet large value addition criteria even though substantial transformation happens. These products will be at disadvantage in the new dispensation. Further, the new rules discriminate against the products from non LDC countries. For example, it is indicated that the value addition will be on the higher side (50 to 60%) for the products originating from the non-LDCs countries (As against 30% from LDCs). The provision may disqualify a number of products from Non LDCs where some of the raw materials is imported.

a no profit organisation

Italy

Education and Research

No. If the two regimes are utilized for pursuing different objectives. See answer above.

a no profit organisation

Italy

REsearch and Education

The issue of overlapping of trade preferences is really serious and restricts the effectiveness of the scheme.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

Yes if they are not aimed at different objectives. They can be used to have a number of instruments equal to the number of objectives.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

Co-existence of different preferential regimes creates confusion and non-transparency. A country should not benefit from GSP, if it has the free trade agreement with the EU

a company

Malaysia

Export Pepper

No

a company

Malaysia

Manufacturing

It should be not a problem for the co-existence of different preferential regimes. Normally importers of EU will choose the more appropriate preferential regimes for themselves.

a company

Malaysia

Manufacturer of furniture

No Comment

a company

Malaysia

Screw fastener manufacturer

The parallel co-existence of different preferential regimes definitely support effective use of the preference by both parties.

a company

Malaysia

Manufacturing

It will create confusion to the both exporter and importer on which preferential regime to be used. It will also create operation confusion at the gate of entry into EU.

a company

Malaysia

Manufacturer

It will support or hinder depending on the rates given as preference to the beneficiary countries

other

Malaysia

International trade and industry ---- Ministry of International Trade and Industry Malaysia

The parallel co-existence of GSP and a bilateral trade agreement for imports into EU does support the effective use of preferences by beneficiary countries.

other

Mauritius

International Trade ---- Government official

Countries having concluded bilateral agreement with the EC should be excluded from the GSP schemes

a company

Myanmar

Information Supply

No it doesn't. As long as dumping does not incur.

other

Panamá

Servicio ---- Ministerio de Comercio e Industria de Panamá

La coexistencia paralela de distintos regímenes no afecta el uso efectivo de las preferencias comerciales por parte del país en desarrollo beneficiario, siempre que dichos países no se acojan a un acuerdo comercial bilateral que incluya como mínimo todas las preferencias de que gocen en virtud del esquema SGP actual.

a company

Paraguay

oilseeds processing

Both instruments will support.

a company

Philippines

Manufacturing of packaging products

Supportive of each.

a company

Philippines

Agriculture and Aquaculture

There is absolutely no parallel co-existence since the restrictions and quarantine laws or HCAPP are too strict and the buying countries does not have any provisions to help the producing country qualify or pass on the protocols for export. If foreign countries want to acquire raw materials from the Phils, they should set-up their own plants or laboratories in the locality

a business association

Portugal

Textile and Clothing Industry

The EU has been promoting bilateral trade agreements, especially FTAs, as a means to overcome the current impasse in WTO negotiations. The existence of a bilateral trade agreement implies in principle that market access conditions are substantially improved for the countries concerned particularly in terms of Tariffs. For this reason the objectives behind the GSP are no longer valid and the regime should no longer apply in these cases. The existence of parallel regimes should be avoided at all costs as they are a source of uncertainty and disruption among business operators.

a company

Qatar

manufacturing

It is complimentary to each other

a company

Qatar

Liquified Natural Gas

No comment.

a business association

Spain

Fisheries

The co-existence of different preferential regimes for imports into the EU from the same developing country hinder effective use of preferences. Therefore, a simplification becomes necessary in favour of a single regime.

a business association

Sweden

The Association of Swedish Chambers of Commerce representing Swedish companies. The Swedish Chambers of Commerce are regional, independent, non-profit making organizations, funded by the members.

The co-existence of parallel frameworks is not a problem for the companies as a whole. The company seek the information they need about the preferential advantages in the TARIC-system, adjusts to the rules that are most favourable and produces the documents that are needed. The problem for the companies is the when the rules of origin not are simple and predictable and this has to be changed. It's crucial for the industry to get accurate information early on to make necessary changes in their import.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 6. It hinders the effective use. The reason is that any information overload complicates things for the actors too much. And parallel systems create information overload.

other

Switzerland

Policy research and negotiation assistance ---- International organization

This is probably an issue that can better be discussed in FTA negotiations, instead of laying down a rule in a GSP regulation.

other

Syrian Arab Republic

Customs ---- Government sector

I do not think that it hinders other Agreements application

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

Even though, Thailand does not have a bilateral trade agreement with the EU at the present time however, Thailand considers that both the GSP and FTA can harmoniously co-exist since they both share the same goal of trade liberalisation. Thailand is of the view that, where a country has both GSP status and the FTA with the EU, the reduced import tariffs under the GSP scheme (both at the zero and the lower rate) should be granted to the products in lieu of the import tariffs under the FTA at a greater rate than zero or higher than those tariffs provided for under the GSP scheme.

a citizen

UK

Private

Yes

a citizen

UK

Economic research

Competent exporters learn which regime to use. New exporters only need to learn about the regime(s) for their product, so this isn't a big problem.

a company

UK

Import and Distribution

it confuses. A standard regime by country or by product (tariff heading) would be better

a no profit organisation

UK

Development Education, campaigns + advocacy

Procedures should be kept as simple and transparent as possible. The onus should be on the EU and its constituent states to provide the best deal and the best advice to developing country

(DC) trading partners, without expecting reciprocation. There should be transparent review mechanism such that an independent monitor can ensure this takes place. Where there is a choice or indeed a clash between different preferential regimes, the more generous to the DC should be presumed to take effect.

Alternative trade agreements should not be used by the EU or member states to 'prise open' the markets of DCs. Until these countries have established their industries (goods and services) on a secure foundation, they should be under no obligation to open up to competition from the much stronger economies of the EU. Trade agreements should not bind DC governments regarding the range of available policy options.

a business association

United Kingdom

Seafood importation

We are not aware of any problems of this type.

a no profit organisation

United Kingdom

animal welfare

Significant successes are being achieved through free trade agreements for animals welfare. Specifically in areas of slaughter, stunning and transport. Equally the opportunity to open informal but regular dialogue on issues pertaining to animal welfare with subsequent achievements in the partner country often extending to legislation change, have been achieved. But FTA agreements take time. For animal welfare, we see the GSP scheme as another small and simple way to keep incentivising developing countries to keep on improving animal welfare standards but only if animal product imports are equivalent to EU standards.

a company

Uruguay

Exportacion de Miel , Cera y Propoleos organico y convencional

En el caso de Uruguay no hay acuerdos bilaterales en la miel y sus derivados . Tenemos dificultad en competir con paises como Chile y Mexico que tienen tasas arancelarias muy preferenciales

other

Vietnam

government official ---- government official

yes need co-existence even for those have FTA with EU because the FTA need transitional time but the enterprises of developing countries can not wait.

Q7: Should the current architecture of GSP - with three regimes GSP, GSP+ and EBA - be changed? If so, how? Does the existence of three sub-arrangements under the scheme affect the effectiveness or transparency of the EU's GSP scheme?

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Wir sehen keine Notwendigkeit einer grundsätzlichen Änderung; wichtig wäre für uns allerdings eine größere Transparenz und Gleichbehandlung bei der Entscheidungsfindung zu APS+. Die derzeitigen Überlegungen zur Gewährung von APS+ an Pakistan sind ein negatives Beispiel für Vorgangsweisen, die diesen Vorgaben in keiner Weise entsprechen und NICHT gesetzt werden dürften!

a no profit organisation

Austria

trade policy

While trade unions still support the three tiered regimes of GSP, GSP+ and EBA, the GSP+ component of GSP has not had a high take-up, with only 15 countries currently on the scheme, and many of them about to leave it. This represents only about 10% of trade flows by volume under whole GSP scheme. One reason for the low take up may be that the scope of preferences offered under GSP+ are being eroded by other trade instruments, and/or are not significantly better than those already granted under the GSP and EBA components to be real incentive. The Commission should consider introducing a better balance of trade preferences, technical assistance incentives, and definitions of "vulnerability" to attract more countries onto the GSP+ component of the scheme. Secondly the Commission should revise the requirements under GSP and EBA to drive better implementation of international conventions

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

IT IS VERY CONFUSING. THERE MUST BE ONE POLICY - DUTY FREE ACCESS FOR THE LDC AND 50% OF NORMAL DUTY FOR DEVELOPING COUNTRIES. ANYOTHER CONFUSING CALCULATION SHOULD BE TAKEN OUT OF THE SYSTEM

a business association

Belgium

International trade in flowers

Union Fleurs believes that the current architecture of the GSP based on three sub-arrangements is appropriate and should remain as it is. A completely new system would choke many operators off, especially exporters in the beneficiary countries, jeopardising the main objectives of the scheme.

a business association

Belgium

Renewable energies

EBB respectfully recommends the reintroduction of the MFN tariff for biodiesel (tariff code 3824.90.91) for beneficiaries of the GSP general scheme. The best way to achieve this is to include a new row in the GSP Regulation Annex for the CN Code 3824 90 91 "Fatty-acid mono-alkyl esters, containing by volume 96,5 % or more of esters (FAMAE)" (NS)" providing that "The arrangement referred to in Section 1 of Chapter II shall not apply to the product of this subheading". However, the tariff preferences should be maintained for developing countries in real need of industrial development, which are covered by the GSP+ and EBA. A suggestion for the modified GSP Regulation Annex can be found in the EBB position ref. 472/TRA/10 sent to TRADE-GSP-Consultation@ec.europa.eu last June 2nd, 2010. It could not be included here because it is under the form of a table.

a business association

BELGIUM

NITROGEN FERTILIZERS

The GSP scheme should be simplified whenever possible.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

The three regimes are clear and do not need to be changed.

a business association

Belgium

International trade

FRUCOM believes that the current architecture of the GSP based on three sub- arrangements is appropriate and should remain as it is. A completely new system would choke many operators off, especially exporters in the beneficiary countries, jeopardising the main objectives of the scheme. That said, we reiterate that other aspects of the scheme should be adjusted: GSP predictability should be improved as well as its product coverage.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

The co-existence of those regimes makes the use and understanding of GSP extremely complex. Simplification is definitively needed.

a business association

Belgium

Wood products

Is the creation of a GSP+ the most efficient way to counter poverty and to stimulate trade? In our opinion: No.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

The existence of several different schemes is not an issue in terms of effectiveness or transparency and we believe that there is no need for change. The effectiveness of the overall scheme is most significantly impacted by MFN duty rates.

a business association

Belgium

Trade association: Man-made fibres

GSP+and EBA should be amalgamated. GSP should exclude wealthier nations

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

The three regimes are clear. There is no need for a change. It would be useful however to have access on the web at any time to the full updated list of GSP beneficiary countries with a clear indication of their current status in respect of these regimes.

a business association

Belgium

Textiles & Clothing

The existence of 3 different regimes inside the GSP-GSP, GSP+ and EBA- should not be a source of problems provided the rules and conditions to access each one of them are clearly defined and are well known to business operators inside and outside the EU. Since predictability and consistency are critical for economic operators GSP conditions should be accurately established whenever a new regime enters into force and remain unchanged for the duration period. Additionally an effective monitoring system is necessary to make sure that fraud and illegal actions are detected in due time and properly corrected.

a business association

Belgium

EUROCHAMBRES, the Brussels-based Association of European Chambers of Commerce and Industry EUROCHAMBRES is the sole European body that serves the interests of every sector and every size of European business and the only one so close to business. EUROCHAMBRES has member organizations in 45 countries representing a network of 1,700 regional and local Chambers with over 19.8 million member companies. Chamber members employ over 120 million employees.

Many companies are not noticing that there are different levels of GSP, but adapt to the given benefits upon importation into the EU. With three different sub-arrangements it is vital for the beneficiary countries and the European importers that the sub-arrangements are predictable and transparent for an easier adaptation.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

No, for the time being it should not be changed, although the GSP - and in particular the GSP plus - is still perceived by many companies as too complex and bureaucratic. Especially the

smaller-sized importers reported that the complexity of the rules is still disproportionate to the cost and bureaucracy inflicted by their application. The parallel existence of the three sub-arrangements as such, however, does not affect the effectiveness or transparency of the EU GSP scheme. EuroCommerce welcomes that an important supplier country like Pakistan could soon be granted GSP plus status. Pakistan is a very important producer of home textiles; the advantage to import these goods free of duty will possibly lead to an increase in imports from this particular beneficiary.

a business association

Belgium

Representing the foreign trade interests of European retail trade

No, there is no need for change.

a company

Belgium

Import of food items

Yes, there should - if at all deemed and proven necessary and justified to be continued - only 1 single, clear and not-to-be-violated or not-to-be-abused-of system

a no profit organisation

Belgium

Development NGO

The three regimes could be joined together in one continuum based on graduation criteria with less stringent borders between LDCs and poor DCs, allowing the latter to enjoy EBA or near EBA treatment (and with rewards for more advanced DCs that respect labour and environmental conventions as in the GSP+)

a no profit organisation

Belgium

Agricultural and Agrifood Trade

CELCAA believes that the current architecture should not be changed and that the three systems GSP, GSP+, EBA should be kept in their current form.

a no profit organisation

Belgium

Economic justice

Create the opportunity for those developing ACP countries, which are non-LDCs, which do not wish to enter into free trade agreements with the EU in order to protect their feeble local economy the possibility to access an enhanced GSP system, which would reduce the negative impact on their exporters. In particular for those non-LDCs, which are in a customs union with LDCs the possibility to join the EBA scheme as well should exist.

a no profit organisation

Belgium

trade union

While trade unions still support the three tiered regimes of GSP, GSP+ and EBA, the GSP+ component of GSP has not had a high take-up, with only 15 countries currently on the scheme, and many of them about to leave it. This represents only about 10% of trade flows by volume under whole GSP scheme. One reason for the low take up may be that the scope of preferences offered under GSP+ are being eroded by other trade instruments, and/or are not significantly better than those already granted under the GSP and EBA components to be a real incentive. The Commission should consider introducing a better balance of trade preferences, technical assistance incentives, and definitions of "vulnerability" to attract more countries onto the GSP+ component of the scheme. Secondly the Commission should revise the requirements under GSP and EBA to drive better implementation of international conventions (See the answer to Question 20 for more detail on both of these areas).

a no profit organisation

Belgium

trade

It does not affect, it should continue the way it is. Different countries different needs.

a no profit organisation

Belgium

COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

COCERAL is in favour of the maintenance of the three systems GSP, GSP+ and EBA in their current form.

other

Belgium

Representing working people in all sectors throughout Europe ---- European Trade Union Confederation

While we still support the three tiered regimes of GSP, GSP+ and EBA, the GSP+ component of GSP has not had a high take-up, with only 15 countries currently in the scheme, and many of them about to leave it. This represents only about 10% of trade flows by volume under whole GSP scheme. One reason for the low take up may be that the scope of preferences offered under GSP+ are being eroded by other trade instruments, and/or are not significantly better than those already granted under the GSP and EBA components to be real incentive. The Commission should consider introducing a better balance of trade preferences, technical assistance incentives, and definitions of "vulnerability" to attract more countries onto the GSP+ component of the scheme. Secondly the Commission should revise the requirements under GSP and EBA to drive better implementation of international conventions (See the answer to Question 20 for more detail on both of these areas).

other

Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)

While we still support the three tiered regimes of GSP, GSP+ and EBA, the GSP+ component of GSP has not had a high take-up, with only 15 countries currently in the scheme, and many of them about to leave it. This represents only about 10% of trade flows by volume under whole GSP scheme.

One reason for the low take up may be that the scope of preferences offered under GSP+ are being eroded by other trade instruments, and/or are not significantly better than those already granted under the GSP and EBA components to be real incentive.

The Commission should consider introducing a better balance of trade preferences, technical assistance incentives, and definitions of "vulnerability" to attract more countries onto the GSP+ component of the scheme. Secondly the Commission should revise the requirements under GSP and EBA to drive better implementation of international conventions (See the answer to Question 20 for more detail on both of these areas).

other

Belgium

advising our members, interest representation ---- Cefic

We think that EBA - as a trade policy instrument - is perfectly sufficient for development aid; the GSP and GSP+ could be given up. (see Q 1) If this cannot be achieved, it is essential to reduce the number of GSP beneficiaries and to enable a graduation of individual products.

a no profit organisation

Bolivia

Exportaciones

Las condiciones de cada país pueden requerir un tratamiento distinto uno de otro por lo que creemos que se deberan mantener regimenes diferenciados SGP.

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

Yes, they should be changed. There should only exist two schemes: The GSP and GSP + based on the fact that the needs of developing countries and least developed countries are almost the

same, they are both exporters of raw materials in essence, so the benefits for both groups should be the same.

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

Debido a que existen países con diferentes características, necesidades y potencialidades deben permanecer los diferentes esquemas que existen actualmente.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

Yes, they should be changed. There should only exist two schemes: The GSP and GSP + based on the fact that the needs of developing countries and least developed countries are almost the same, they are both exporters of raw materials in essence, so the benefits for both groups should be the same

a no profit organisation

Bolivia

industry

We start from the principle that different countries need different treatments, so it is necessary to have different schemes in order to achieve specific necessities.

other

BOLIVIA

EXPORTS ---- Government representative

Yes, there could be another list of preferences for special countries that really need more support than others.

other

Bolivia

Government ---- Government Official

The current architecture could be maintained since it takes into account the different needs of certain countries and helps to address the issues of those countries that are more vulnerable.

other

Bolivia

Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio

Las condiciones de cada país pueden requerir un tratamiento distinto, uno de otro. por lo que creemos que se deben mantener regímenes diferenciados SGP

a business association

Brazil

industrial sector

The current architecture of GSP should not be changed, since those sub-arrangements positively affect its effectiveness. Differences in income and competitiveness of sectors of the countries are answered satisfactorily by the three schemes.

other

Brazil

Government ---- Ministry of External Relations - Federative Republic of Brazil

Having only one GSP arrangement based on common and objective criteria would enhance effectiveness and transparency of the EU GSP Scheme.

a company

Cambodia

Export

It would be changed but for the EBA, it should be adjusted to its local content or reduce its local content from 49% to around 25%.

other

Colombia

Tourism and Trade (Import-Export) ---- Government of Colombia

Colombia believes that you should not change the current architecture of the SGP containing the three above-mentioned regimes.

a business association

Ecuador

Ecuadorian Exportes Federation

No convendría unificar los regímenes sino perfeccionar el direccionamiento de las preferencias de conformidad con la potencialidad exportadora de los países que requieren de estos beneficios.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

The current structure of the GSP is well designed, therefore it is not advisable to modify it.

a business association

Finland

Trade Policy

The current architecture of GSP should be carefully studied and the number of regimes should be minimal.

a business association

France

MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies

The current architecture should be presented as follows : § GSP for Developing countries, excluding all the high income countries; § GSP+ ; § EBA for LDCs (as defined by the World Bank).

a business association

France

Textile

The current architecture of GSP is good. Three regimes instead of five before was an important simplification but now it would be difficult to have less without impacting the GSP objectives.

a business association

France

Fishery products - Tuna

No - The current architecture of the scheme (Standard GSP, GSP + and EBA) is working well and should not be changed. Especially the GSP+ should be maintained as a pillar regime in the successor regulation.

a business association

Germany

Industry

We think that EBA - as a trade policy instrument - is perfectly sufficient for development aid; the GSP and GSP+ could be given up. (see Q 1) If this cannot be achieved, it is essential to reduce the number of GSP beneficiaries and to enable a graduation of individual products.

a company

Germany

chemical sector

EBA is a valid trade instrument for development, as it focuses on the least developing and most vulnerable countries, in need of support. GSP and GSP+ could therefore be given up. In case this could not be achieved, it is essential to reduce the number of GSP beneficiaries and to enable a graduation of individual product level, not on section level. Indeed, the new GSP regime should indeed better react to the new economic reality 2010 where some “developing countries”

currently benefiting from GSP do not fulfill the current graduation thresholds although they are extremely competitive in some product groups. This puts the European manufacturing industry at an unfair competitive disadvantage.

a company

Germany

Think-tank for European and international economy and governance

well, if they are known and the figures etc, can be found - no problem!

a company

Germany

We don't see the need to change the current architecture.

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

We think that EBA - as a trade policy instrument - is perfectly sufficient for development aid; the GSP and GSP+ could be given up. (see Q 1) If this cannot be achieved, it is essential to reduce the number of GSP beneficiaries and to enable a graduation of individual products.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

The GSP should be targeted on the countries that most need it such as the GSP+ (vulnerable countries) and EBA (least-developed countries) countries. Considering the GSP beneficiary countries has different levels of development, the granted preferences to boost their economies has also different. The current architecture of the GSP scheme (Standard GSP, GSP + and EBA) is working well since allowing to consider the different levels of development of the countries. Therefore, it should be not changed.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

The GSP should be targeted on the countries that most need it such as the GSP+ (vulnerable countries) and EBA (least-developed countries) countries. Considering the GSP beneficiary countries have different levels of development, the granted preferences to boost their economies has also different. The current architecture of the GSP scheme (Standard GSP, GSP + and EBA) is working well since allowing to consider the different levels of development of the countries. Therefore, it should be not changed.

a no profit organisation

India

Research in International Economic Relations

It is best to have a simple system and an uncomplicated architecture. Uniform treatment of all beneficiaries is the ideal toward which the donors should strive. At the most two levels may be acceptable, the standard GSP regime and the EBA regime for the LDCs. A separate regime for LDCs is acceptable because the list is finite and has been developed by an international body on the basis of objective criteria. In the case of the countries eligible for GSP + the criteria of vulnerability that have been developed by the EU are somewhat arbitrary. The less than one percent of GSP trade share criterion does not take into account the size of the country and the incidence of poverty, particularly the numbers of people below the poverty level.

a no profit organisation

Italy

Education and Research

I don't know enough to be able to answer..

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

Not the effectiveness. Perhaps the transparency.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

No, three different regimes conform to the different development levels of the beneficiary countries and also to the different commitments in the area of good governance and sustainable development. In such way the GSP contributes to the achievement of its policy goals. The Union's GSP is efficient and transparent.

a company

Malaysia

Export Pepper

No

a company

Malaysia

Screw, Nut & Washer

No

a company

Malaysia

Manufacturing

The purpose of GSP is to give a hand to developing countries to reduce poverty. Unfortunately there are still some MNC companies in developing countries apply for GSP, and this could be harmful for many others SMEs companies in developing countries, as we as EU itself.

a company

Malaysia

Manufacturer of furniture

No Comment.

a company

Malaysia

Screw fastener manufacturer

No.

a company

Malaysia

Manufacturing

The three architecture of GSP should be combined and remain as GSP in order to eliminate confusion among exporters and importers.

other

Malaysia

International trade and industry ---- Ministry of International Trade and Industry Malaysia

The current architecture of GSP should be maintained.

a company

Myanmar

Information Supply

No

other

Panamá

Servicio ---- Ministerio de Comercio e Industria de Panamá

Teniendo en cuenta que el SGP es un programa unilateral, se considera que los tres regímenes que conforman este programa (SGP, SGP+ y EBA) no deben ser cambiados. Así mismo, la existencia de estos sub-acuerdos no afecta la eficacia y transparencia del Régimen del SPG de la UE.

a business association

Paraguay

National development of the Export sector

No, this structure responds clearly to the different development levels of the several developing countries

a company

Philippines

Manufacturing of packaging products

So far, we do not encounter any problem with the current status.

a business association

Portugal

Textile and Clothing Industry

The existence of 3 different regimes inside the GSP-GSP, GSP+ and EBA- should not be a source of problems provided the rules and conditions to access each one of them are clearly defined and are well known to business operators inside and outside the EU. Since predictability and consistency are critical for economic operators GSP conditions should be accurately established whenever a new regime enters into force and remain unchanged for the duration period. Additionally an effective monitoring system is necessary to make sure that fraud and illegal actions are detected in due time and properly corrected.

a company

Qatar

manufacturing

It should be uniform arrangement

a company

Qatar

Liquified Natural Gas

As a general principle, we find that the simpler the architecture of any system, the easier it is to follow.

a business association

Spain

Fisheries

Yes, the current three regime architecture of GSP should be changed into a single regime.

a business association

Sweden

The Association of Swedish Chambers of Commerce representing Swedish companies. The Swedish Chambers of Commerce are regional, independent, non-profit making organizations, funded by the members.

Many companies are not noticing that there are different levels of GSP, but adapt to the given benefits upon importation into the EU. With three different sub-arrangements it is vital for the beneficiary countries and the European importers that the sub-arrangements are predictable and transparent for an easier adaptation.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 7. The main reason for the bad functioning of GSP and the disadvantage for smaller countries to use it is the origin requirements with typically double transformation requirements. To solve

this totally basic problem the origin requirements has to be changed into a single transformation rule, like the one for textiles and garments in the EPA:s. This is the key to the survival of GSP, not that traders care much but anyway. But such an origin rule would in Brussels jargon be: circumvention. To balance these two opposing elements GSP has to be concentrated to LDC:s and countries eligible for GSP + only. And it makes some sense that GSP is directed towards to poorest countries. I would like to recommend the book A Farewell to Alms: A brief Economic History of the World by Gregory Clark, which will give you a perspective on what GSP can accomplish.

other

Switzerland

Policy research and negotiation assistance ---- International organization

We argue for a separate scheme for Sub Saharan Africa. Many countries in Africa are in a similar economic and social situation, whether they have been classified as an LDC or not. An example is the Republic of Congo. While the Republic of Congo has not been classified as a LDC, it is recognized as Highly Indebted Poor Country (HIPC). Others such as Nigeria, Swaziland and Zimbabwe have life expectancy rates around 40-46 years, more than 30% or 40% below the world average.

other

Syrian Arab Republic

Customs ---- Government sector

I am not so familiar with GSP+, EBA regimes

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

No. For the sake of predictability, legal certainty and stability, the current three regimes of the GSP should not be changed. Continuous changes in the EU's GSP scheme will cause disruption in business functions and development plans in developing countries, which undermines its objective of promoting trade and giving support for sustainable development as well as any positive incentives to investment in Thailand's preference-receiving sectors. By providing a longer period of time basis for the scheme (i.e. 10-15 years), the EU would give a clear signal regarding the seriousness of its intentions to help developing countries with the strengthening their exporting capacities. Moreover, the three sub-arrangements under the current scheme may somehow affect the transparency of the GSP scheme in which different treatments are provided for developing countries which might lead to the problem of circumvention in the way that products from countries not eligible for zero or low import tariffs may try to gain the originating status in the countries benefiting from better preferential access.

a citizen

UK

Construction

No

a citizen

UK

Economic research

Yes: put all developing countries under EBA. The current regime diverts export opportunities from some developing countries to others (from GSP exporters to LDCs and GSP + exporters; from GSP and GSP + exporters to LDCs). It is inefficient as well as immoral for the EU effectively to require some developing countries to lose exports for the benefit of others. In addition, there are all the well-known inefficiencies from rules of origin, making it difficult or impossible to cumulate across regimes.

a company

UK

Import and Distribution

I think this is okay as in effect it allows for developing countries to be measured at different levels and stages of development. It is easily understood.

a no profit organisation

UK

Development Education, campaigns + advocacy

The three existing schemes should operate in a continuum, with full market access for the least developed countries (as with the current EBA), but near-EBA status for those countries whose conditions are closest to those in the LDC group. The EBA group should be expanded to include those countries most comparable on the UNDP's Human Development Index, particularly where those countries fall within the same region.

other

UK

Multi sector trade union - public services, manufacturing and commercial services ---- trade union

GMB can see a case for the three tiered regimes of GSP, GSP+ and EBA, however regrets that the incentivised GSP+ component of GSP has not had a high take-up, with only 15 countries currently on the scheme, and many of them about to leave it. This represents only about 10% of trade flows by volume under whole GSP scheme. One reason for the low take up may be that the scope of preferences offered under GSP+ are being eroded by other trade instruments, and/or are not significantly better than those already granted under the GSP and EBA components to be real incentive. The Commission should consider introducing a better balance of trade preferences, technical assistance incentives, and definitions of "vulnerability" to attract more countries onto the GSP+ component of the scheme. Secondly the Commission should revise the requirements under GSP and EBA to drive better implementation of international conventions (See the answer to Question 20 for more detail on both of these areas).

a business association

United Kingdom

Seafood importation

The current architecture of three regimes has worked well so far; however we would support improvements that would make the system less bureaucratic and easier for businesses to administer. The existence of the three sub-arrangements does not affect the effectiveness or transparency of the scheme.

a no profit organisation

United Kingdom

Representing workers in all sectors in the UK

While trade unions still support the three tiered regimes of GSP, GSP+ and EBA, the GSP+ component of GSP has not had a high take-up, with only 15 countries currently in the scheme, and many of them about to leave it. This represents only about 10% of trade flows by volume under whole GSP scheme.

One reason for the low take up may be that the scope of preferences offered under GSP+ are being eroded by other trade instruments, and/or are not significantly better than those already granted under the GSP and EBA components to be real incentive.

The Commission should consider introducing a better balance of trade preferences, technical assistance incentives, and definitions of "vulnerability" to attract more countries onto the GSP+ component of the scheme. Secondly the Commission should revise the requirements under GSP and EBA to drive better implementation of international conventions (See the answer to Question 20 for more detail on both of these areas).

a company

Uruguay

Exportacion de Miel , Cera y Propoleos organico y convencional

No deberia cambiar

Q8: How far in advance of its entry into force should a GSP Regulation be published in order to provide economic operators and other interested parties with enough time to become aware of and adjust to any changes?

a business association

Argentina

Argentine Oil Industry Chamber

It is important for economic operators to be informed as soon as possible of the new scheme, in order to guarantee the best use of them. If the new regimen will be effective in 2014 as informed and considering the EU domestic administrative and legislative process post Lisbon Treaty, it will be reasonable to publish the new Regulation not after mid 2011. Additionally, we wish to emphasize that the new Regulation should maintain the current market conditions to achieve development policy goals from the EU to developing countries.

a business association

Argentina

Argentine Biofuels Chamber

It is important for economic operators to be informed as soon as possible of the new scheme, in order to guarantee the best use of them. If the new regimen will be effective in 2014 as informed and considering the EU domestic administrative and legislative process post Lisbon Treaty, it will be reasonable to publish the new Regulation not after mid 2011. Additionally, we wish to emphasize that the new Regulation should maintain the current market conditions to achieve development policy goals from the EU to developing countries.

a business association

Argentina

Rosario Board of Trade

It is important for economic operators to be informed as soon as possible of the new scheme, in order to guarantee the best use of them. If the new regimen will be effective in 2014 as informed and considering the EU domestic administrative and legislative process post Lisbon Treaty, it will be reasonable to publish the new Regulation not after mid 2011. Additionally, we wish to emphasize that the new Regulation should maintain the current market conditions to achieve development policy goals from the EU to developing countries.

a business association

Argentina

Buenos Aires Grain Exchange

It is important for economic operators to be informed as soon as possible of the new scheme, in order to guarantee the best use of them. If the new regimen will be effective in 2014 as informed and considering the EU domestic administrative and legislative process post Lisbon Treaty, it will be reasonable to publish the new Regulation not after mid 2011. Additionally, we wish to emphasize that the new Regulation should maintain the current market conditions to achieve development policy goals from the EU to developing countries.

a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

It is important for economic operators to be informed as soon as possible of the new scheme, in order to guarantee the best use of them. If the new regimen will be effective in 2014 as informed and considering the EU domestic administrative and legislative process post Lisbon Treaty, it will be reasonable to publish the new Regulation not after mid 2011. Additionally, we wish to emphasize that the new Regulation should maintain the current market conditions to achieve development policy goals from the EU to developing countries.

a business association

Argentina

Bahia Blanca Grain Exchange

It is important for economic operators to be informed as soon as possible of the new scheme, in order to guarantee the best use of them. If the new regimen will be effective in 2014 as informed and considering the EU domestic administrative and legislative process post Lisbon

Treaty, it will be reasonable to publish the new Regulation not after mid 2011. Additionally, we wish to emphasize that the new Regulation should maintain the current market conditions to achieve development policy goals from the EU to developing countries.

a no profit organisation

Argentina

Export services

It is important for economic operators to be informed as soon as possible of the new scheme, in order to guarantee the best use of them. If the new regimen will be effective in 2014 as informed and considering the EU domestic administrative and legislative process post Lisbon Treaty, it will be reasonable to publish the new Regulation not after mid 2011.

a no profit organisation

Argentina

Research on international Negotiations

It is important for economic operators to be informed as soon as possible of the new scheme, in order to guarantee the best use of them. If the new regimen will be effective in 2014 as informed and considering the EU domestic administrative and legislative process post Lisbon Treaty, it will be reasonable to publish the new Regulation not after mid 2011. Additionally, we wish to emphasize that the new Regulation should maintain the current market conditions to achieve development policy goals from the EU to developing countries.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Es importante señalar que si bien la preferencia arancelaria brindada bajo el SGP puede constituir una herramienta importante para estimular el acceso a mercados, por sí sola no alcanza para asegurar que una exportación sea materializada. Para ello resulta indispensable implementar otras tantas acciones que van desde la difusión de la ventajas otorgadas por el régimen a través de dependencias públicas hasta el cumplimiento de los estándares oficiales para el producto en cuestión y el diseño e implementación de campañas comerciales para poder vender el producto por parte de los exportadores.

Atento a ello entendemos de suma importancia que se brinde tiempo suficiente entre la publicación y la entrada en vigor de forma de permitir a los exportadores beneficiarios del SGP hacer el aprovechamiento más integral posible de las preferencias otorgadas a través del mismo. En caso de que la vigencia del actual reglamento sea extendida por 3 años más y el nuevo régimen entre en vigor a partir de 2014, sería importante poder contar con la nueva norma no más tarde de mediados del año 2011.

a business association

Argentine

Argentine Soybean Chain Association

It is important for economic operators to be informed as soon as possible of the new scheme, in order to guarantee the best use of them. If the new regimen will be effective in 2014 as informed and considering the EU domestic administrative and legislative process post Lisbon Treaty, it will be reasonable to publish the new Regulation not after mid 2011. Additionally, we wish to emphasize that the new Regulation should maintain the current market conditions to achieve development policy goals from the EU to developing countries.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Mindestens 1 Jahr im voraus; APS+-Gewährung allenfalls kurzfristiger. Keine jährlichen Graduierungen, sondern Graduierungs- und Degraduierungsentscheidungen für eine Mehrjahresperiode. Das geplante Roll-over der geltenden VO für 2 weitere Jahre sollte daher auch keine wesentlichen inhaltlichen Änderungen, Veränderungen der Parameter, Beurteilungskriterien, Grenzwerte etc. beinhalten.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

NOT REALLY REQUIRED. THIS IS A BENEFIT THAT THE EXPORTERS NORMALLY PASS ON TO THE BUYERS THROUGH CHEAPER PRICES. IMPORTERS IN EU ARE AWARE OF MOST DEVELOPMENTS WHILE EXPORTERS CAN ALSO CHANGE FAST. TWO WEEKS IS SUFFICIENT

a business association

Belgium

Cocoa sector

One of the main experiences as regards current GSP is that economic operators would favour knowing details on any change of the scheme well in advance in order to organize themselves accordingly. The contract period for cocoa products is normally 2 years. Therefore timely notice would be very useful when publishing the new GSP Regulation or when any change in the list of beneficiary countries might occur. For example today (June 4) selected countries to be granted the GSP+ preferences as from 1 July 2010 are still not published which leaves insufficient time to use granted preferences from July onwards.

The timely notice could be strengthened with a publicly available information system where economic operators could consult available information on different countries benefiting or likely to benefit in the different GSP arrangements. The current validity period of the GSP scheme could be extended because of the above mentioned contract periods. The possibly longer legislative processes on future GSP schemes in the EU after the adoption of the Lisbon Treaty also suggest the prolongation of the GSP application period.

a business association

Belgium

International trade in flowers

For all economic operators (European importers as well as developing countries exporters) it is key that the GSP Regulation is published in the Official Journal at least one year prior to the entry into force. Additionally, any other changes such as graduation or withdrawal should also be notified to operators at least one year in advance. The European institutions must understand that operators necessarily need more time to adapt to the changes that a new Regulation will entail.

a business association

Belgium

Renewable energies

The European Commission DG Trade should take all the time needed to conduct a full revision of the GSP Regulation.

a business association

BELGIUM

NITROGEN FERTILIZERS

9 months in advance.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

12-months

a business association

Belgium

International trade

For all economic operators (European importers as well as developing countries exporters) it is key that the GSP Regulation is published in the Official Journal at least one year prior to the entry into force. Additionally, any other changes such as graduation or withdrawal should also be notified to operators at least one year in advance.

The European institutions must understand that operators necessarily need more time to adapt to the changes that a new Regulation will entail. Please consider the example below which illustrates how a short period of notice is incompatible with the lead times of processed

vegetable products and prevents operators from using the GSP. The time elapsing between the conclusion of the contract, shipment and delivery varies depending on product type and country of origin. Vegetable products are normally shipped 4-6 weeks after the conclusion of the contract. The shipping time is normally around 4 weeks before the merchandise arrives at the customs warehouse. After 3 months of warehousing the merchandise is cleared through customs and delivered to the company's branch offices.

Depending on the stock in the latter, several additional weeks elapse before the goods arrive physically in the supermarket. In summary: - 4-6 weeks until shipment - 8-10 weeks until arrival of the goods in the customs warehouse - 20-22 weeks until customs clearance or delivery to the branch offices. As contacts normally cover shipments over a period of several months (up to one year) in some cases the last shipments leave up to 12 months after the conclusion of the contract. Customs clearance and delivery are then delayed accordingly. The shipping period depends on the harvesting periods (one or more harvests per year) and on the country of origin.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

We believe at least 6 months and 12 months if changes are substantial, for the sake of transparency.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

Eighteen to twenty-four months is the minimum advance notice that economic operators in our sector need to properly plan their sourcing and imports and to be able to adapt to changes, whether they affect product coverage, country eligibility, graduation or product sensitivity, that impact our sourcing patterns.

a business association

Belgium

Trade association: Man-made fibres

Three months

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

12-month advance notice would seem to be a minimum, in particular if the changes are substantial.

a business association

Belgium

EUROCHAMBRES, the Brussels-based Association of European Chambers of Commerce and Industry EUROCHAMBRES is the sole European body that serves the interests of every sector and every size of European business and the only one so close to business. EUROCHAMBRES has member organizations in 45 countries representing a network of 1,700 regional and local Chambers with over 19.8 million member companies. Chamber members employ over 120 million employees.

One year is a reasonable time for the traders to prepare and adjust to this new regulation.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

All elements of the new GSP must be known one year in advance, thus giving traders a reliable basis for their calculation. The work on Commission and EU-27 level needs to be structured in a way as to enable the publication of the new GSP in the Official Journal not later than one year prior to entry into force. To this end, EuroCommerce welcomes the proposal made by the European Commission to provide for a roll-over of the current GSP for two additional years in order to allow the necessary time needed by the European Institutions involved.

The same goes for the GSP Plus application round. EuroCommerce understands that the GSP Plus should give an accurate picture of the due implementation of the 27 relevant Conventions;

however if the aim is to create an incentive to traders to import consciously from GSP Plus countries, the European Communities need to provide clarity on the country list at a much earlier stage; otherwise the incentive will de facto be meaningless for the first months of validity - as illustrated by the lead times listed in the EuroCommerce position paper published in July 2009, downloadable from the internet:

<http://www.eurocommerce.be/media/docs/intrade/GSP2012EuroCommerce.doc>

No return to annual graduation. Early warning (one year) for any changes: - An early warning mechanism for GSP users could be operated on the DG Trade website under the umbrella of the Export Helpdesk for Developing Countries. - Relevant information should also be provided in the languages of the main beneficiary countries. Concerning the GSP rules of origin intrinsically linked with the GSP, EuroCommerce has submitted detailed suggestions in its position paper of July 2009 (see pages 5-7):

<http://www.eurocommerce.be/media/docs/intrade/GSP2012EuroCommerce.doc>

In response to the present consultation on the GSP, a member reported the following to EuroCommerce: "Over the past two years, the customs authorities in our country have sent back more than 300 GSP Form A certificates to the Export Promotion Office Dhaka (Bangladesh) in the assumption that they were faked. Much later - in some cases more than six months (!) - the EPO then informed the customs authorities that the Form A were correct. Ultimately, this was the case for more than 80% of the originally returned Form A certificates.

We as importer have the problem that for the long period of missing evaluation of the EPO we have to build accrued liabilities (costing a lot of interests), and we have to advise our buyers that they should better not calculate the goods free of duty. In the future, such way of handling by the customs authorities could well lead to the decision that some buyers will simply refrain from placing any more orders in Bangladesh. With the solution suggested in the EuroCommerce position paper (see hyperlink above) we hope that such problems could be avoided. To illustrate the need for a simple, stable and predictable GSP, EuroCommerce has listed the lead times for individual groups of products (including textiles, textiles articles, ready-made garments, footwear, furniture, vegetable products, foodstuffs and others) in its GSP position paper of July 2009 (see pages 8-10):

<http://www.eurocommerce.be/media/docs/intrade/GSP2012EuroCommerce.doc>

a business association

Belgium

Representing the foreign trade interests of European retail trade

With a view to the necessary predictability for traders and exporter all elements of the new GSP including the GSP+ countries must be known one year in advance.

a company

Belgium

Import of food items

If at all to be continued : minimum 6 months pre-advice

a no profit organisation

Belgium

Agricultural and Agrifood Trade

The GSP scheme should remain predictable for operators and as such CELCAA believes that the Regulation should be published at least with a minimum of one year but preferably two years in advance, in the framework of a 5 year regulation. Moreover, any talks on the withdrawal of a product or a new country beneficiary from the GSP scheme should be communicated well in advance in order to ensure that operators can foresee changes and adapt consequently.

a no profit organisation

Belgium

trade

At least 1 year

a no profit organisation

Belgium

COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

The Regulation should be published at least two in advance, in order to ensure that agri-bulk traders comply with other EU standards concerning traceability and sustainable production. Any discussions on the elimination of a product from the GSP scheme, either through graduation or the triggering of a safeguard clause, should be made public well in advance in order to allow operators to foresee the change and adapt.

other

Belgium

Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)

In the interests of certainty and predictability, economic operators should be allowed sufficient time to plan their sourcing and imports and be able to adapt to changes in product coverage, eligible beneficiary countries, eligible GSP+ countries, graduation or sensitivity of the products that impact our sourcing patterns. Eighteen to twenty-four months is the minimum period of time to guarantee this certainty. An early-warning system should be implemented sufficiently in advance of the publication at the time when stakeholders can comment.

other

Belgium

advising our members, interest representation ---- Cefic

Changes to the GSP framework also involve considerable technical and administrative changes for EU importers, including budgeting and procurement of suitable software (ETS/ATLAS). Long-term contracts with suppliers and forwarders need to be adapted. Companies must be given enough time for these activities. On the other hand, we also request a longer duration for the Regulation (see Q 36). In order to meet both demands, we plead for an advance time of 3 to 6 months from publication in the EU Official Journal.

a no profit organisation

Belgium, Brussels

leather sector. COTANCE represents interests of National Associations of Tanners and Dressers

3 months

a no profit organisation

Bolivia

Exportaciones

Estimamos que se requiere por lo menos un año para adaptar las industrias y productos a cualquier cambio del SGP.

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

It's necessary at least three or four months in advance

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

Las economías y empresas requieren por lo menos un año de plazo para adaptarse a cualquier cambio en el Reglamento del SGP, por lo que cualquier modificación debería darse a conocer con una anticipación similar a su entrada en vigencia.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

It's necessary at least three months in advance

a no profit organisation

Bolivia

industry

6 months.

other

BOLIVIA

EXPORTS ---- Government representative

Three months in advance.

other

Bolivia

Government ---- Government Official

The length of time of publication would depend on the changes made, if minor changes are made it could take around 6 months to adapt, however if material changes are made it may be that a longer period will be needed. It depends on the degree of predictability

other

Bolivia

Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio

Estimamos que se requiere por lo menos un año para adaptar las industrias y productos a cualquier cambio en el SGP

a business association

Brazil

industrial sector

The GSP regulation must be published 30 before its entry into force in order the economic agents adjust properly to any changes.

other

Brazil

Government ---- Ministry of External Relations - Federative Republic of Brazil

There should be given a one-year notice to economic operators and other interested parties before any changes to the GSP regulation

a company

Cambodia

Export

It should published 4 months ahead.

other

Colombia

Tourism and Trade (Import-Export) ---- Government of Colombia

The schema should have a validity of 10 to 15 or 20 years in time and should develop regulations every 5 years, which will give greater security and legal stability to traders and investors. The publication of each regulation should be at least 8 months before coming into force, thus enabling operators to move smoothly in their negotiations from one regulation to another. This will provide the authorities of the beneficiary countries with enough time for the preparation of the application that you must fill out in order to continue receiving the benefits of the GSP plus.

a business association

Ecuador

Ecuadorian Exportes Federation

Mientras mayor anticipación mejor para los exportadores por lo que se recomienda por lo menos contar con un año de anticipación en la publicación de reglamentos antes de su entrada en vigor.

a business association

Ecuador

Tuna Industry

18 months

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

It is convenient to publish the GSP regulation at least 6 (six) months before its entry into force.

a business association

Finland

Trade Policy

All changes in the GSP system should be published at least one year before their entry into force and any major reforms at least three years in advance.

a business association

Finland

Pulp, paper, paperboard and wood products industries interest representation

At least one year in advance.

a business association

France

MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies

Changing the GSP framework will have considerable technical and administrative impacts for EU importers in terms of IT software and customs procedures. They should be given enough time to be compliant. On the other hand, they also demand certainty in enforcement within a longer duration for the Regulation. For these reasons, we propose an advance time of 6 months from publication to the EU Official Journal.

a business association

France

Textile

Minimum 6 months especially if the new regulation include new rules.

a business association

France

Fishery products - Tuna

Few monthes (3 to 6)

a business association

Germany

Industry

Changes to the GSP framework also involve considerable technical and administrative changes at EU importers, including budgeting and procurement of suitable software (ETS/ATLAS). Long-term contracts with suppliers and forwarders need to be adapted. Companies must be given enough time for these activities.

a company

Germany

chemical sector

Changes to the GSP framework involve considerable technical and administrative changes for economic operators, including budgeting and procurement of suitable software (ETS/ATLAS). Long-term contracts with suppliers and forwarders need to be adapted. Companies must be given enough time for these activities. On the other hand, we also request a longer duration for the Regulation (see Q 36). In order to meet both demands, we consider an advance time of 3 to 6 months from publication in the EU Official Journal suitable.

a company

Germany

Think-tank for European and international economy and governance
at least 2-3 months, but even longer would be favourable

a company

Germany

A lead time of at least 12 months is needed.

a company

Germany

production of fine chemicals on request - toll manufacturer for fine chemicals

6 month

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

Changes to the GSP framework also involve considerable technical and administrative changes at EU importers, including budgeting and procurement of suitable software (ETS/ATLAS). Long-term contracts with suppliers and forwarders need to be adapted. Companies must be given enough time for these activities. On the other hand, we also request a longer duration for the Regulation (see Q 36). In order to meet both demands, we wish for an advance time of 3 to 6 months from publication in the EU Official Journal.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

Considering the entry into force the Treaty of Lisbon and the necessity of users of this regime are fully informed, the new GSP scheme should be published with several months in advance of its entry into force so that the economic operators and users of the GSP are fully and on time informed of any changes so that its implementation do not generate a obstacle to trade.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

Considering the entry into force the Treaty of Lisbon and the necessity of users of this regime are fully informed, the new GSP scheme should be published with several months in advance of its entry into force so that the economic operators and users of the GSP are fully and on time informed of any changes so that its implementation do not generate a obstacle to trade.

a no profit organisation

India

Research in International Economic Relations

Predictability of trade regime is a prerequisite for trade expansion as it helps to plan production. One calendar year is the minimum needed by economic operators to gear their production to the new conditions of competition that changes in the GSP could entail.

a no profit organisation

Italy

Education and Research

For developing countries, at least 1 year

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

For LDC at least 1 year.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

It is desirable to have sufficient time for economic operators to prepare themselves for changes. The objective of entry into force one year after publication of the regulation should be maintained.

a company

Malaysia

Screw, Nut & Washer

5 years

a company

Malaysia

Manufacturing

Normally the introduction of GSP is rely on government bodies of a developing countries, but not all the government bodies always word hard to promote GSP preferential regimes to the local companies. So, it's better for GSP regulator promote this preferential regimes at the trade show in EU.

a company

Malaysia

Screw fastener manufacturer

At least 6 months.

a company

Malaysia

Manufacturing

6 months in advance

a company

Malaysia

Manufacturer

There should be at least 6 -9 months notice .

other

Malaysia

International trade and industry ---- Ministry of International Trade and Industry Malaysia

6 months.

other

Mauritius

International Trade ---- Government official

one year

a company

Myanmar

Information Supply

4 months

other

Panamá

Servicio ---- Ministerio de Comercio e Industria de Panamá

Para efecto de proporcionar a los operadores económicos, partes interesadas y países beneficiarios el tiempo suficiente para conocer y adaptarse a los cambios al Reglamento del SGP, se debería ofrecer por lo menos 12 meses para realizar los respectivos ajustes que permitan aprovechar sus beneficios.

a business association

Paraguay

National development of the Export sector

It could be favourable advise these changes several months before. Paraguay's entry to GSP+ was announced almost 3 weeks before (December 9, 2008), and this was not enough time to take these advantages immediately.

a company
Paraguay
oilseeds processing
At least 6 months.

a company
Philippines
Manufacturing of packaging products
Six months to one year in advance for the affected parties to adapt to the changes.

a company
Qatar
manufacturing
one year

a company
Qatar
Liquified Natural Gas
As a general principle, we find that the more time parties have to become aware of and adjust to changes, the better those changes are implemented.

a company
Qatar
Chemicals and Petrochemicals
2 years

a business association
Spain
Fisheries
Before any Regulation is published, all proposals in favour of introducing changes should be subject to consultation and gather consensus from the sectors involved.

a business association
Sweden
The Association of Swedish Chambers of Commerce representing Swedish companies. The Swedish Chambers of Commerce are regional, independent, non-profit making organizations, funded by the members.
One year is a reasonable time for the traders to prepare and adjust to this new regulation.

a business association
Sweden
Representing the Swedish textile-, garment-, and shoe import trade
Q 8. At least 12 months. 18 would be great. It is interesting that you think anything like this can be done by EU. Have you made so great changes in the system that this is possible? We bet the new regulation on GSP will be published a few weeks before it will come into function as usual.

other
Switzerland
Policy research and negotiation assistance ---- International organization
In the first instance, a draft GSP regulation need to be published to allow comments from economic operators and other interested parties. We could imagine a time period of at least 1.5-2 years to allow countries to redesign their national industrial development or export strategies

other
Syrian Arab Republic

Customs ---- Government sector

I think we need some workshops to explain the new adjustment, in order to be able to notify the traders and the trade society about it

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

The EU's trade policy-making process is becoming more complicated, and will require longer lead in time and preparation. For the purposes of predictability and legal certainty, Thailand suggests that all elements of the new GSP should be made known/public at least one year in advance in order to give economic operators a reliable basis for their strategic plans and calculation. Further an early warning mechanism for any changes made to the GSP as well as all relevant information should be given to the GSP users at least one year in advance through the DG Trade website.

a citizen

UK

Economic research

Minimum of a year (for ALL changes). Even what seems to be an improvement for some countries may be a disadvantage for others (for example, the original announcement of EBA was at much too short notice for non-LDCs).

a company

UK

Import and Distribution

6 months

a business association

United Kingdom

Seafood importation

No comment

a company

Uruguay

Tanned sheepskins and garments.

2 years.

a company

Uruguay

Exportacion de Miel , Cera y Propoleos organico y convencional

6 meses

Q9: Are there any aspects of the current GSP Regulation which you consider to be particularly significant as either (a) incentives or (b) obstacles to access to the GSP by beneficiary countries?

a no profit organisation

Argentina

Export services

One important aspect would be to have more publicity of the current regulation aim directly to the european importers, on the first hand, and then to all interested parties on beneficiary countries.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Uno de los incentivos que brinda la actual normativa es la posibilidad de acumulación de origen regional, lo cual implica que los insumos procedentes de los países socios de un mismo bloque sean considerados originarios del país exportador. Actualmente sólo se benefician de la acumulación regional 3 grupos de países, entre los cuales todavía no se encuentra el MERCOSUR. Consideramos que la inclusión de MERCOSUR entre los grupos cuyos miembros pueden utilizar la acumulación de origen regional, incentivaría el uso por parte de sus exportadores de las preferencias otorgadas bajo SGP.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Voraussetzung für eine Inanspruchnahme des APS sind Einfachheit, Stabilität und Vorhersehbarkeit der Regelungen sowie Rechtssicherheit für den Importeur. Dazu zählen auch Ursprungsregeln, die dem Importeur nicht von ihm nicht kontrollierbare Verantwortungen auferlegen, allenfalls auch die ärmeren EL zum Vorteil von schon bereits ausreichend entwickelten EL behindern. Im Übrigen spielen gerade Ursprungsregeln bei der Ausnützbarkeit eines Präferenzsystems eine wesentliche Rolle.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

THE LOCAL CONTENT IS VERY CONFUSING. IT MUST BE MADE SIMPLER AND EASY TO IMPLEMENT. NOWADAYS COUNTRIES IMPORT MANY RAW MATERIALS AND THE LOCAL CONTENT CONFUSES THE WHOLE ISSUE. THOUGHTS NEEDS TO BE MADE HOW TO MAKE IT SIMPLE

a business association

Belgium

International trade in flowers

The GSP is an incentive to importers in the EU to take the entrepreneurial decision to source from the scheme's beneficiary countries. Hence, the GSP needs to be simple, stable and predictable in order to attract its target group.

The current utilisation rate of approx. 80% is largely due to the improvements implemented over the past decade (e.g.: no more annual graduation, GSP specific product classification replaced with HS chapters, a simpler incentive regime (GSP+) instead of the former social, environmental etc. incentive clauses, publication of the GSP more than half a year prior to its entry into force).

The GSP 2009 built on these achievements and further improved the predictability of the system. The next GSP should consolidate and further develop the improvements contained in the current scheme and provide additional meaningful liberalisation for developing countries' exports. If the aim is to provide incentives to stakeholders to increase trade against the backdrop of preference erosion, the system must be even simpler, easier to apply, more predictable and give traders more legal certainty.

a business association

Belgium

Renewable energies

The difference between soybean oil and biodiesel is effectively close to 18%, as the applied export tax on soybean biodiesel effectively amounts to 14.16% . It should be noted that when the export tax for soybean oil was increased from 24.5% to 32% in 2007 , the export tax on biodiesel was also increased from 2.5% to 14.16% .

From the point of view of Argentine producers, re-aligning the export taxes for biodiesel with the export tax on soybean oil after the increase of the latter contributed to protecting the investments made in biodiesel production facilities, because this re-alignment of both export taxes contributed to maintaining the previous differential between soybean oil and biodiesel. As such, this re-alignment contributed to maintain the economic operators' economic expectations, which confirms the potential of the differential export taxes as a support scheme to the Argentine biodiesel industry.

Similarly, Indonesia also levies an export tax on crude palm oil, with a view to stabilize the prices and supply to the domestic market, which includes biodiesel producers. Crude palm oil is one of the raw material for biodiesel production in Indonesia, Malaysia, the EU and the US. Since the export tax was introduced in 1994, the rate varied from 40% to 60% before decreasing to 5% in July 1997. Exports were banned from February 1998 to July 1999, when a 60% export tax was reintroduced .

The export tax rate is adjusted monthly and was increased from 3% to 4.5% in April 2010 . Although Malaysia does not have a proper export tax on palm oil, trade is distorted by a 15% 'windfall tax' levied on palm oil exports when prices reach \$756.4, which adds up to similar regional taxes levied when prices exceed \$907.6 .

This trade distortion is amplified by the fact that the MFN customs duty is applied to palm oil from Indonesia and Malaysia as they are graduated for vegetable oils, whereas biodiesel falls under GSP, giving an additional incentive to process palm oil into biodiesel locally instead of exporting the palm oil to the EU.

Despite EBB warnings , the EU Customs Code Committee cancelled the specific tariff suspension for palm oil to be processed into biodiesel and reintroduced the normally applicable non-preferential import duty for palm oil is 5.1% (CN code 1511909100) from July 1st, 2009. This indirect incentive is higher than the export tax levied by Indonesia on its palm oil exports. This customs duty differential adds up to the Indonesian export tax and consequently Indonesia and Malaysia now have a respective incentive to produce biodiesel locally equivalent to 9.6% and 5.1% of the biodiesel price.

As shown in this section, the same countries receiving duty-free access to the EU market for biodiesel are placing significant restrictions on the EU's access to raw materials for biodiesel production. In addition to meeting the EU trade openness with protectionism, Argentina, Indonesia and Malaysia impede the achievement of EU policy objectives for renewable energies in transport. Indeed, these barriers go against the EU demand for feedstock necessary to reach the 10% target for renewable energy in transport . These barriers to trade work in favour of the thriving non-EU biodiesel sectors, while EU biodiesel producers have not been given the chance to recover from the unfair competition from the subsidized and dumped US biodiesel.

EBB noted that the GSP general scheme is not applicable for four tariff headings and nine tariff subheadings, ranging from fruits to mineral fertiliser and including undenatured ethanol, another biofuel. EBB wishes to emphasize that the removal of tariff heading 2207 from the coverage of the GSP general scheme was motivated by the trade distortion created by the Brazilian public support to its national ethanol industry, a very similar case to the current situation of the European biodiesel industry.

a business association

BELGIUM

NITROGEN FERTILIZERS

The primary objective of this review for the EU nitrogen fertilizers industry is to maintain the current exclusion of Russia, Belarus and Ukraine from GSP rights on straight nitrogen fertilizers. The justification for the exclusion here remains stronger than ever- the persistence of dual gas pricing with artificially low gas prices cross subsidised by highly inflated gas prices to the EU. There is thus a double injury. First, gas prices are fixed at artificially low levels in the gas supplier country and this is subsidised by artificially monopolistic type prices to the EU. Second the low gas prices in the nitrogen fertilizers exporter/producer country are used to conduct unfair dumping and subsidy campaigns to the EU on a regular and very damaging basis.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

Limited capacity (for example at customs, or in the area of SPS standards) can be an obstacle to the use of GSP. This should be addressed through capacity building measures. Complicated rules of origin can be an obstacle to the use of the GSP, a coherent reform of such rules could improve this situation. Simplifying Rules of Origin requirements for LDCs to allow for regional cumulation for the countries that are eligible for the Everything But Arms scheme, is another possibility.

a business association

Belgium

representation of interests of the EU food and drink industry

Export taxes, including differential ones, hamper GSP benefits for exporters in developing countries. Therefore, rules that limit raw material restrictions should be introduced under the reformed scheme.

a business association

Belgium

International trade

The GSP is an incentive to importers in the EU to take the entrepreneurial decision to source from the scheme's beneficiary countries. Hence, the GSP needs to be simple, stable and predictable in order to attract its target group. The current utilisation rate of approx. 80% is largely due to the improvements implemented over the past decade (e.g.: no more annual graduation, GSP specific product classification replaced with HS chapters, a simpler incentive regime (GSP+) instead of the former social, environmental etc. incentive clauses, publication of the GSP more than half a year prior to its entry into force). The GSP 2009 built on these achievements and further improved the predictability of the system. The next GSP should consolidate and further develop the improvements contained in the current scheme and provide additional meaningful liberalisation for developing countries' exports. If the aim is to provide incentives to stakeholders to increase trade against the backdrop of preference erosion, the system must be even simpler, easier to apply, more predictable and give traders more legal certainty.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance For unclear reasons, part of our products fall within GSP and others (silicon) do not. In other words, ferro-alloys are considered for some years as downstream products falling within GSP while in the past, they were considered as raw materials and hence, were excluded. The absence of a consistent definition of the GSP product scope is an important issue. Taking into account other legislative frameworks (like the "raw materials initiative", where ferro-alloys qualify at least for DG Trade), it is difficult to understand why ferro-alloys were taken back into the GSP scheme which does not apply to raw materials.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

The rules of origin for GSP have at times been a significant obstacle in the apparel industry where the requirement of a double transformation exists for eligibility. As fabrics become more technologically advanced it is becoming increasingly difficult to establish the complete production infrastructure in the beneficiary country. FESI therefore welcomes that in the proposed reformed GSP Rules of Origin (ROO) that, at least for LDCs, only a single transformation is required.

However FESI would also encourage that this be extended to all GSP beneficiary countries. It is true that this problem can partly be overcome through regional cumulation or bilateral cumulation with the EU, as already applicable today. FESI notes that the proposed reformed GSP ROO also provide for cumulation between the SAARC and ASEAN groupings which is welcome. FESI also notes that in the proposed rules the possibility is raised for further extended cumulation possibilities and encourages the Commission to adopt such rules.

a business association

Belgium

Trade association: Man-made fibres

No

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

Implementation procedures in the beneficiary countries are in some cases not conducive to the recourse to GSP (e.g. in India - approval of GSP declaration forms by local authorities may take

several days and delay shipment accordingly). In another respect, one should not lose sight of the incentive provided by the GSP to global companies to invest in the beneficiary countries either to create synergies with EU operations (+ for the EU) or to materialize a process of delocalisation (- for the EU).

a business association

Belgium

Textiles & Clothing

Rules of Origin are critical conditions for developing countries to benefit from GSP. For T&C Rules of Origin are elemental in determining investment and business plans for companies in the developing countries as well as in the EU. Moreover Rules of Origin can play an important role in accomplishing the GSP objective of helping the least developed countries by preventing an excessive trade concentration in the major T&C suppliers. The current GSP Rules of Origin for T&C are undergoing a revision process aimed at simplifying and facilitating GSP access for developing countries. Any other measures aimed at further simplification or promotion of regional cumulation should be carefully considered as they might hinder the development prospects of the most sensitive countries in favour of the already dominant world suppliers of T&C and major GSP users.

a business association

Belgium

EUROCHAMBRES, the Brussels-based Association of European Chambers of Commerce and Industry EUROCHAMBRES is the sole European body that serves the interests of every sector and every size of European business and the only one so close to business. EUROCHAMBRES has member organizations in 45 countries representing a network of 1,700 regional and local Chambers with over 19.8 million member companies. Chamber members employ over 120 million employees.

The incentives are the overall duty reduction from these beneficiary countries. Obstacles may appear as difficulties in the issuing of the certificates. Both the exporter and the guaranteeing authority sometimes have poor knowledge of the complicated framework for the certificates. This means that importers can get their certificates dismissed, for which customs duty will be charged. Certificates might as well be lost during the delivery of the goods.

All countries do not issue certificates retrospectively and this may cause the importer to pay duty where they in fact are entitled to a tariff reduction. An additional obstacle is the incapability for beneficiary countries to offer electronic certificates. Electronic certificates are more easily controlled and do not get lost in the delivery process.

To reduce the paperwork regarding the certificates the possibility of using invoice declarations also should be reviewed. To make the system easier and more comprehensible a greater amount of goods should be included in the GSP and a tariff reduction of 3.5% for "sensitive" products should be considered.

It is important that developing countries are given the opportunity to not only export raw materials but also more processed goods, which will provide more employment and greater economic growth. It is also important to delete all the remaining duties that are 3% or lower when a customs duties reduction of 3.5% is given. "Nuisance duties" are not administratively justifiable to preserve. Another obstacle for the companies is the graduation mechanism. The fact the some product can be graduated from the system makes the system unpredictable and hard to follow for the companies.

It is vital for the beneficiary countries and the European importers that the system as a whole is predictable and transparent for an easier adaptation. The GSP system should be based on objective development criteria and not be based on sensitive or not sensitive products for the EU industry. What the EU should encourage is technical assistance in building productive capacity in the LDCs.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

The GSP is an incentive to importers in the EU to take the entrepreneurial decision to source from the scheme's beneficiary countries. Hence, the GSP needs to be simple, stable and predictable in order to attract its target group. The current utilisation rate of approx. 80% is largely due to the improvements implemented over the past decade. In its GSP position paper adopted in 2006, EuroCommerce welcomed the improvements offered by the GSP 2005,

especially the increased simplification and enhanced predictability (e.g.: no more annual graduation, GSP specific product classification replaced with HS chapters, a simpler incentive regime (GSP+) instead of the former social, environmental etc. incentive clauses, publication of the GSP more than half a year prior to its entry into force).

The GSP 2009 built on these achievements and further improved the predictability of the system. Importers and retailers were able to plan their sourcing in due time since the Commission published the draft GSP Regulation one year ahead of its entry into force. As the subsequent changes exclusively enhanced the preferential offer, traders were spared unnecessary losses and adjustment costs. The publication in the EC Official Journal in August 2008, however, came later than expected.

The next GSP should consolidate and further develop the improvements contained in the current scheme and provide additional meaningful liberalisation for developing country exports. If the aim is to provide incentives to stakeholders to increase trade against the backdrop of preference erosion, the system must be even simpler, easier to apply, more predictable and give traders more legal certainty.

a business association

Belgium

Representing the foreign trade interests of European retail trade

No, in principle the current GSP works rather well. Nevertheless, it should be secured in future that the system is easier to apply, as predictable as possible and offers to all parties concerned more legal certainty.

a company

Belgium

Import of food items

Fact is that major users and importers of the system do regard this solely as a means to achieve bigger profits for them/their companies, to get access to cheaper materials and products, and in such a way to continue to so-called : abolished system of neo-colonialism and paternalism covered with a " blanket " of opening up markets for these poor countries

a no profit organisation

Belgium

Agricultural and Agrifood Trade

A predictable GSP system with changes communicated well in advanced, as well as an operator-friendly and simple system would improve access of GSP by beneficiary countries. Furthermore, CELCAA would favour the maintaining of a harmonised legal document which ensure the protection of the importer's good faith in case of false declaration of origin.

a no profit organisation

Belgium

trade

Norms of origin

a no profit organisation

Belgium

COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

COCERAL is in favour of maintaining a harmonised legal document which ensures the protection of the importer's good faith in case of false declaration of origin. An enhanced predictability of the GSP system, through communications made well in advance on possible changes, would further improve access of GSP by beneficiary countries.

other

Belgium

advising our members, interest representation ---- Cefic

Maintaining generous and appropriate preferential tariff rates under the standard GSP

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

The GSP provides tariff preferences on the ad valorem or specific tariff. In the case of mixed tariffs, the preference applies only to the ad valorem tariff. We suggest considering the removal of this restriction so the tariff preference applies to both. Because sometimes that is more expensive.

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

No existe ningún aspecto particularmente importante.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

The GSP provides tariff preferences on the ad valorem or specific tariff. In the case of mixed tariffs, the preference applies only to the ad valorem tariff. We suggest considering the removal of this restriction so the tariff preference applies to both

a citizen

Cambodia

Garment Industry

obstacle is the complication of rule of origin

a company

Cambodia

Export

It granted either incentives or obstacles: -Incentives: it means it provide best opportunity for LDCs to access the EU's markets, Obstacle: it means that Rules of Origin of the EU established some tactical obstacles to the trade between the LDCs and the EU.

a business association

Ecuador

Ecuadorian Exportes Federation

Debería considerarse nuevos incentivos, tales como una profundización de las preferencias arancelarias, el tratamiento de barreras no arancelarias y el otorgamiento de cooperación técnica-económica y la simplificación de procedimientos aduaneros y de obtención de certificados de origen.

a business association

Ecuador

Tuna Industry

In rules of origin for tuna fishery products, there should be vessels' crew accumulation between beneficiary countries and third countries that have Trade or Association Agreements with the UE.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

New incentives should be envisaged, such as a deepening of the tariff preferences, the treatment of non-tariff barriers and the granting of non reimbursable economic and technical co-operation. All this has been analyzed in answers 2 a), 2 c), 3, 4 and 5.

a business association

Finland

Trade Policy

The rules of origin should not be changed so that the responsibilities of the importers increase, because that will lead to less interest in the GSP among the importers and thus cut imports from the beneficiary countries.

a business association

France

Textile

The aspect which could be considered like an obstacle to access to the GSP by beneficiary countries is the rules of origin. The EU worked since 2005 to review the rules on preferential system. The new rules would be more incentive.

a company

Germany

Think-tank for European and international economy and governance

just the lack of know-how of users of the regulation (but it can go also positive, see e.g. example of Georgia)

a company

Germany

The most important incentive for using the GSP scheme are the reduced duty rates (or duty free treatment respectively) compared to the MFN rates. In order to justify the increased administrative burden linked to the GSP preference documentation, a certain level of financial benefit is crucial. The difference between MFN duties and the GSP rate should therefore be sufficiently meaningful.

a company

Germany

production of fine chemicals on request - toll manufacturer for fine chemicals

all that create unfair trade and support problematic standards

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

The following elements should be considered to be particularly significant: - The GSP scheme should be targeted on the countries that most need it (vulnerable and least-developed countries), establishing the needed measures so that these countries are able to export their products to the EU without obstacles. - ALL GSP beneficiary countries (three regimes of the GSP scheme) should ratify and implement of the international conventions related to human & labour rights, and adhere to environment, sustainable development and governance principles, as well as the hygienic-sanitary standards. The EU has to implement effective controls to ensure these requirements are obeyed. - The trade measures adopted under these scheme should not put at a competitive disadvantage to EU industry, putting the interests of development in Third countries over the competitiveness and viability on the EU industry.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

The following elements should be considered to be particularly significant:

- The GSP scheme should be targeted on the countries that most need it (vulnerable and least-developed countries), establishing the needed measures so that these countries are able to export their products to the EU without obstacles.

- ALL GSP beneficiary countries (three regimes of the GSP scheme) should ratify and implement of the international conventions related to human & labour rights, and adhere to environment, sustainable development and governance principles, as well as the hygienic-sanitary standards. The EU has to implement effective controls to ensure these requirements are obeyed.

- The trade measures adopted under this scheme should not put at a competitive disadvantage to EU industry, putting the interests of development in Third countries over the competitiveness and viability on the EU industry.

a no profit organisation

India

Research in International Economic Relations

Most of the industrial products which developing countries produce in the early stages of industrialization/development are categorized as sensitive in the EU GSP and the preferential benefit is limited to them. Ironically, aircraft and spacecraft and parts thereof under Chapter 88, which most developing countries do not produce is listed as non-sensitive.

other

INDIA

TRADE POLICY ---- GOVERNMENT OF INDIA

Setting up and maintain administrative structure

(A) In the legal text, many articles use a phrase necessary structures or support without elaborating what it exactly means. For the sake of uniformity it would be helpful if such words are defined in detail. For example, Article 68.1 (a) mentions putting up in place and to maintain the necessary national and regional administrative structures and systems required for the implementation and the management of the rules and procedures. Similarly, Article 68.2 (a) mentions providing all necessary support in the event of a request by the commission for the monitoring by it of the proper management of the scheme of the country concerned.

(B) The new rules talk about punitive action in case of non compliance on the part of beneficiary countries. The new rules mandate that the GSP availing countries will have to submit undertaking to the commission in this regard and if any country (Article 74.4) fails to comply with the undertaking its name may be withdrawn from the beneficiary country list. The phrase defining the compliance parameters needs to be elaborated.

(C) Process of registration is mentioned in Article 89, 90 and 91. Article 91 mentions that name of the exporters who no longer meet the conditions for exporting goods should be removed from the record of a registered exporter of the GSP beneficiary country upon information by him to the registering authority. It is not clear if the name of multi product exporters needs to be removed from the register if he does not meet the condition for exporting one product under the scheme but continues getting GSP benefits for the other products.

(D) The new database set up will add up to the cost of the government and the exporters.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner
the excessive red tape as obstacle.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

We believe that current GSP rules of origin perfectly serve the purpose to ensure that GSP preferences would go to those countries for which they are intended. Therefore the reform of GSP RoO must be carried out in a very cautious manner in order not creating unintended trade deflections

a company

Malaysia

Export Pepper

Nil

a company

Malaysia

Screw, Nut & Washer

No

a company

Malaysia

Manufacturing

not sure

a company
Malaysia
Manufacturer

GSP standard is an incentive for exporters from Malaysia to the EU countries

other
Malaysia

International trade and industry ---- Ministry of International Trade and Industry Malaysia

In general, GSP regulation is considered as incentives to the beneficiary countries when they are not classified by the World Bank as high income countries and which are not sufficiently diversified in their exports. However, Chapter III of the Regulation is viewed as obstacles to penetrate EU market access due to Temporary Withdrawal and Safeguard Provisions which may not be in line with the GSP objectives.

a business association
Myanmar

Garment and Apparel Manufacturing

EU sanctions against Myanmar are autonomous measures. The effect was not supposed to be what EU sought by removing GSP. In reality, it helps pushing Myanmar regime to become stronger in control of resources and people, hence less contributing to the objective, reduction of poverty and development, in which case, the grassroots and working class majority are the main sufferers.

a business association
Myanmar
Association

From time to time, frequent reviews on those countries whose GSP are withdrawn, should be done for the re-instatement.

a company
Myanmar
Information Supply

Yes current privileges of GSP should be given to Myanmar.

a business association
Paraguay

National development of the Export sector

The rules of origin could cut off some benefits just for the countries with least developed industries, which have to import raw materials to assemble them in their country. It may be advantageous to establish a differential GSP system, with total tax exemption for actual national goods and a Tax reduction for assembled goods. (example, the textile sector)

a company
Philippines
Manufacturing of packaging products
Nothing so far.

a business association
Portugal
Textile and Clothing Industry

Rules of Origin are critical conditions for developing countries to benefit from GSP. For T&C Rules of Origin are elemental in determining investment and business plans for companies in the developing countries as well as in the EU. Moreover Rules of Origin can play an important role in accomplishing the GSP objective of helping the least developed countries by preventing an excessive trade concentration in the major T&C suppliers. The current GSP Rules of Origin for T&C are undergoing a revision process aimed at simplifying and facilitating GSP access for developing countries. Any other measures aimed at further simplification or promotion of regional cumulation should be carefully considered as they might hinder the development prospects of the most sensitive countries in favour of the already dominant world suppliers of T&C and major GSP users.

a company
Qatar
Liquified Natural Gas
No comment.

a business association
Sweden

The Association of Swedish Chambers of Commerce representing Swedish companies. The Swedish Chambers of Commerce are regional, independent, non-profit making organizations, funded by the members.

The incentives are the overall duty reduction from these beneficiary countries. Obstacles may appear as difficulties in the issuing of the certificates. Both the exporter and the guaranteeing authority sometimes have poor knowledge of the complicated framework for the certificates. This means that importers can get their certificates dismissed, for which customs duty will be charged.

Certificates might as well be lost during the delivery of the goods. All countries do not issue certificates retrospectively and this may cause the importer to pay duty where they in fact are entitled to a tariff reduction. An additional obstacle is the incapability for beneficiary countries to offer electronic certificates. Electronic certificates are more easily controlled and do not get lost in the delivery process.

To reduce the paperwork regarding the certificates the possibility of using invoice declarations also should be reviewed. To make the system easier and more comprehensible a greater amount of goods should be included in the GSP and a tariff reduction of 3.5% for "sensitive" products should be considered. It is important that developing countries are given the opportunity to not only export raw materials but also more processed goods, which will provide more employment and greater economic growth. It is also important to delete all the remaining duties that are 3% or lower when a customs duties reduction of 3.5% is given. Nuisance duties are not administratively justifiable to preserve. Another obstacle for the companies is the graduation mechanism.

The fact the some product can by graduated from the system makes the system unpredictable and hard to follow for the companies. It is vital for the beneficiary countries and the European importers that the system as a hole is predictable and transparent for an easier adaptation.

The GSP system should be based on objective development criteria and not be based on sensitive ore note sensitive products for the EU industry. What the EU should encourage is technical assistance in building productive capacity in the LDC's.

a business association
Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q9. It is many cases not worth while to use GSP at all. The risk are too high and the benefits to small. 0 duties for clothing compared to 12 is fine but 9.6 to 12 is most often not worth while. Origin rules stops a lot of GSP from smaller countries without an integrated value chain. GSP is biased by advantage for big countries and richer countries that can afford expensive machinery. W hope you are aware that the scandals we have had on Bangladesh is an illustration of this. Bangladesh should not have had GSP as the country could not live up to the origin rules at the time when it cheated on knitted clothing. The country was to poor to afford spinning machines. As a result the GSP origin rules had to be changed from three transformations to two which Bangladesh could manage (man powered knitting machines not so expensive).

The latest scandal with Chinese woven fabrics illustrates the same apart from the fact that the few but powerful weavers in Bangladesh hindered the government to ask EU for an exemption of origin rules. (Apart that it was in incentive to circumvent the "Bra War"-quotas via Bangladesh, via Bangladesh the Chinese garments became quota free and duty free.) The thing goes: Importer say I buy only goods that qualify for GSP. Exporter says always yes. Lack of woven fabric in Bangladesh (the country is to poor for expensive weaving machines) makes the exporter to fix fabrics from China or finished products from China)

It is impossible to discuss GSP separated from preference or GSP origin rules. It is actually a bit stupid to even think so. You let bureaucratic formalities take over meaningful discussion.

other

Switzerland

Policy research and negotiation assistance ---- International organization

The cut of 3.5 percentage points or 20% - in most instances resulting in a cut of less than 3 percentage points, seem to be rather small.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

Based on its experience, Thailand has faced some major obstacles which prevent it from utilizing the current GSP scheme.

These include:

(i) the existing tariff reduction is not sufficiently attractive to motivate traders to utilize the preferential treatment under the GSP;

(ii) the EU's rules of origin for some products (especially agricultural and processed agricultural products and industrial products) are relatively strict and

(iii) a limited possibility is given in sourcing material inputs used in the production of the goods to qualify for the reduced rate of import duties.

In addition, although Thai exporters are able to produce goods that meet the conditions set out in the rules of origin, it is often the case that these goods cannot access the EU's markets due other restrictions and barriers such as the white paper on food safety, the directive on animal welfare, the draft directives on electronic and electrical wastes, etc. These restrictions therefore have become the obstacles for Thailand to fully utilize the preferential import tariffs under the GSP scheme.

a citizen

UK

Economic research

Rules of origin, but they are not the subject of this survey.

a company

UK

Import and Distribution

no

a no profit organisation

UK

Development Education, campaigns + advocacy

Were they not ruled out by the terms of reference of this consultation, this would be the place to argue for making the Rules of Origin more generous.

a business association

United Kingdom

Seafood importation

No comment

Q10: Under the current standard GSP regime, "non-sensitive" products are given duty-free treatment,. "Sensitive" products are subject to a fixed-rate reduction from MFN rates (in general 3.5 percentage points on ad valorem duties but for products from Sections XI textiles - by 20% and for specific duties -by 30%) but still remain subject to duties and certain other products are excluded from the regime altogether, so remain subject to MFN duties. Should the new Regulation adjust the balance between these three categories? Should the treatment of "sensitive" products be adjusted?

a business association

Argentina

Argentine Oil Industry Chamber

Yes, the new regulation should adjust the balance between the described categories. First, considering EU GSP goals, the whole tariff universe should be taken into account. Second, objective, transparent, science-sound parameters should be established in advance to designate a product like “sensitive” in order to improve predictability and transparency in trade preferences, withdrawing subjectivity of the revised scheme. Specially, considering that “sensitive product” (SP) are affected by an exceptional - less beneficial for developing countries - tariff treatment.

The last revision of the Regulation modified the benefits of certain products bringing on economic crisis in specific third countries industries which are small and family producers in general. Therefore, there is a clear need to introduce Impact Assessment Studies for designating a SP so as to evaluate impact in developing countries and weighing up real consequences on EU if the decision is made. The EU counts with many precise tools to pursue such assessment.

a business association

Argentina

Argentine Biofuels Chamber

Yes, the new regulation should adjust the balance between the described categories. First, considering EU GSP goals, the whole tariff universe should be taken into account. Second, objective, transparent, science-sound parameters should be established in advance to designate a product like “sensitive” in order to improve predictability and transparency in trade preferences, withdrawing subjectivity of the revised scheme. Specially, considering that “sensitive product” (SP) are affected by an exceptional - less beneficial for developing countries - tariff treatment.

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a business association

Argentina

Rosario Board of Trade

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a business association

Argentina

Buenos Aires Grain Exchange

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a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

Yes, the new regulation should adjust the balance between the described categories. First, considering EU GSP goals, the whole tariff universe should be taken into account. Second, objective, transparent, science-sound parameters should be established in advance to designate a product like “sensitive” in order to improve predictability and transparency in trade preferences, withdrawing subjectivity of the revised scheme. Specially, considering that “sensitive product” (SP) are affected by an exceptional - less beneficial for developing countries - tariff treatment.

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a business association

Argentina

Bahia Blanca Grain Exchange

Yes, the new regulation should adjust the balance between the described categories. First, considering EU GSP goals, the whole tariff universe should be taken into account. Second, objective, transparent, science-sound parameters should be established in advance to designate a product like “sensitive” in order to improve predictability and transparency in trade preferences, withdrawing subjectivity of the revised scheme. Specially, considering that “sensitive product” (SP) are affected by an exceptional - less beneficial for developing countries - tariff treatment.

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a no profit organisation

Argentina

Export services

Yes, the new regulation should adjust the balance between the described categories. First, considering EU GSP goals, the whole tariff universe should be taken into account. Second, objective, transparent, science-sound parameters should be established in advance to designate a product like “sensitive” in order to improve predictability and transparency in trade preferences, withdrawing subjectivity of the revised scheme. Specially, considering that “sensitive product” (SP) are affected by an exceptional -less beneficial for developing countries- tariff treatment.

Therefore, there is a clear need to introduce Impact Assessment Studies for designating a SP so as to evaluate impact in developing countries and weighing up real consequences on EU if the decision is made. The EU counts with many precise tools to pursue such assessment.

a no profit organisation

Argentina

Research on international Negotiations

Yes, the new regulation should adjust the balance between the described categories. First, considering EU GSP goals, the whole tariff universe should be taken into account. Second, objective, transparent, science-sound parameters should be established in advance to designate a product like “sensitive” in order to improve predictability and transparency in trade

preferences, withdrawing subjectivity of the revised scheme. Specially, considering that “sensitive product” (SP) are affected by an exceptional - less beneficial for developing countries - tariff treatment.

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other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

En primer lugar entendemos que cualquier análisis de equilibrio entre las categorías debería ser realizado a la luz de los objetivos del régimen, el cual es el de fomentar las exportaciones de los PED como herramienta para el desarrollo. Dicho esto deseamos compartir nuestra preocupación dado que gran cantidad de productos de nuestra oferta exportable a la UE (productos agrícolas) se encuentran dentro de la categoría de “productos sensibles” y otros tantos directamente excluidos de toda preferencia bajo el SGP. A su vez, las preferencias otorgadas para los productos “sensibles” es baja y en la mayoría de los casos no otorga ventajas competitivas en el acceso (es decir, no favorece el ingreso de productos que, de no mediar la preferencia, no podrían ingresar).

Atento a ello, la posibilidad de que Argentina haga un aprovechamiento integral de los beneficios del sistema en tanto herramienta para fomentar nuestras exportaciones y favorecer nuestro desarrollo se ve fuertemente limitada. Si bien somos conscientes del derecho de la UE de excluir del SGP e identificar como sensibles los productos que estime pertinentes, consideramos que en aras de fortalecer la previsibilidad y transparencia del sistema sería importante considerar la posibilidad de establecer parámetros objetivos para la toma de decisiones en este campo.

a business association

Argentine

Argentine Soybean Chain Association

Yes, the new regulation should adjust the balance between the described categories. First, considering EU GSP goals, the whole tariff universe should be taken into account. Second, objective, transparent, science-sound parameters should be established in advance to designate a product like “sensitive” in order to improve predictability and transparency in trade preferences, withdrawing subjectivity of the revised scheme. Specially, considering that “sensitive product” (SP) are affected by an exceptional - less beneficial for developing countries - tariff treatment.

The last revision of the Regulation modified the benefits of certain products bringing on economic crisis in specific third countries industries which are small and family producers in general. Therefore, there is a clear need to introduce Impact Assessment Studies for designating a SP so as to evaluate impact in developing countries and weighing up real consequences on EU if the decision is made. The EU counts with many precise tools to pursue such assessment.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Wir halten die Aufrechterhaltung einer Kategorie von "sensiblen" Waren mit reduzierten Restzöllen im Interesse der EU-Industrie für unverzichtbar; eine generelle Zollfreiheit wäre strikt abzulehnen. Wir sprechen uns GEGEN jede weitere Senkung der für "sensible" Waren anzuwendenden Zölle aus. KEINE Erhöhung der de-minimis-Schwelle, unter der keine Zölle eingehoben werden.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

OF COURSE. THERE SHOULD NOT BE SENSITIVE LIST AT ALL. SINCE EU KNOWS THAT THEY ARE GIVING SOME BENEFITS IT MEANS THAT THEY ARE PREPARED TO SACRIFICE IN ORDER FOR SOME COUNTRIES TO BE BETTER OFF. RESTRICTIONS MAKE IT FRUITLESS EFFORT

a business association

Belgium

International trade in flowers

Union Fleurs believes that the treatment of sensitive products (e.g. flowers and plants under Chapter 6 of the CN code) should be improved and the fixed reduction granted under the GSP should be much higher than only 3.5 percentage points, especially for products which are subject to high MFN rates, in order to create a real incentive for importers to use the GSP preferences.

This is even more relevant in the context of a progressive preference erosion which in the long-run will considerably undermine the attractiveness of preferential regimes granted to developing countries; specific efforts should therefore be made to improve the preferences for sensitive products and reduce the distinction with non-sensitive products.

As regards specifically the floricultural sector, Union Fleurs has long been advocating for a global liberalisation of tariffs as large as possible and for tariffs preferences for flowers and plants exported from developing countries to be always at 0%. The international floricultural market has very low margins (approximately 2-3 percent) and is extremely competitive.

Even a slight increase in import duties seriously jeopardizes the export potential of developing countries, as shown when exporting countries like Colombia and Costa Rica were temporarily graduated from the 'GSP drug preferences' in 2003/2004: during this period, instead of benefiting from a duty-free access to the EU, all flowers imported from Colombia and Costa Rica returned to be subject to the MFN rates (8.5 percent duties in winter time and 12.5 in summer time) . This not only had detrimental effects on the floricultural industries in these countries but also dramatically reduced the availability of a wide variety of better quality flowers for EU importers, wholesalers, retailers and consumers.

a business association

BELGIUM

NITROGEN FERTILIZERS

The GSP regime should be simplified such that regular "super-sensitive" products are excluded from the regime permanently. Nitrogen fertilizers from Russia, Ukraine and Belarus fall in this category.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

There is no need to change neither the existing product categories nor the treatment given to sensitive products.

a business association

Belgium

International trade

1) FRUCOM believes that the treatment of sensitive products should be improved and the fixed reduction granted under the GSP should be much higher than 3.5 percentage points, especially for products which are subject to high MFN rates, in order to create a real incentive for importers to use the GSP preferences.

This is even more relevant in the context of a progressive preference erosion which in the long-run will considerably undermine the attractiveness of preferential regimes granted to developing countries; specific efforts should therefore be made to improve the preferences for sensitive products and reduce the distinction with non-sensitive products. As an example, the preferential import duty for preserved tuna of CN code 1604 14 from supplying countries such as Thailand, Indonesia and Philippines is of 20.5% under GSP conditions, which, compared to 24% MFN, remains a substantially high level of tariff duties in spite of the application of a tariff preference.

Such limited tariff preferences can only account for a very small part in the total importers' calculation leading to the decision to import from one origin under GSP or another one under

MFN. Other factors contribute as much, and often even more, into the final decision. In this respect, one very important factor is currency rate fluctuations, which frequently outweigh the potential effects of a GSP preference and play a much greater role in the importer's calculation and final decision.

2) In addition, a series of product remain excluded from the general GSP scheme (e.g. products under CN code 0409 00, 0710 80 70, 0811 10/20, 2005 80 00, 2008 70), while benefiting of the GSP+ provisions only. This mechanism can be highly risky for a country subject to withdrawal of GSP+ preferences and which had previously attracted a considerable amount of domestic and foreign investments.

We believe that those products eligible under GSP+ should also be eligible under the standard GSP provisions (therefore no more exceptions for products such honey, prepared and preserved pears, peaches, berries, etc)..

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance
As mentioned before, we do believe that a proper (and consistent) definition of the product scope is key. Keeping the sensitivity of some products makes sense. But what does not make sense is to keep the preference for those products originating from those countries and which are subject to trade defence measures (anti-dumping, anti-subsidy measures). It is not legitimate to keep a tariff preference and at the same time, impose additional customs duties for the same product/origin!

a business association

Belgium

Wood products

Sensitive products must be taken seriously by the EU authorities. For example: other countries like Russia close or protect their markets much more and do not grant preferential duties to the same extent as the EU does. Here we are experiencing competitive imbalances in the end. This is definitely the case for wood products.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

(i) Lack of transparent criteria: The absence of a definition of what is considered "sensitive" and "not-sensitive" creates a lack of legal certainty and predictability. If this distinction amongst products is to be maintained then objective benchmarks should be adopted and be made accessible to all GSP stakeholders. The current list is outdated and a regular in-depth review is required at the latest when a new Regulation is adopted rather than at the time of the Framework Communication.

(ii) Differentiation between textiles and other goods: No distinction should be made between textiles and other products. Textiles is a crucial industrial sector in many developing countries and a cornerstone of their economic development plans. Textiles demand labour intensive work creating significant employment in GSP countries while providing consumer products not only for export but also for local demand and thereby creating a path for sustainable economic growth. Abolition of the distinction will render the system more beneficial to those countries.

The competitiveness of European business in the textiles sector is based around brand-building, the speed and flexibility to react to changes in market trends, using technologically advanced materials and fibres in production design and so on.

The future for European businesses, while maintaining market leadership in Europe, is to develop exports targeting growing consumer markets. While there might still be considerable interest in maintaining this policy it must be clear that its effect can be to protect uncompetitive European business from legitimate competition. If the system is to be maintained then it should be limited to certain sectors that will provide the building blocks for future competitiveness and not be based on historic business models.

(iii) Differentiation between sensitive and non-sensitive products: For all sensitive products, the reduction granted under the General Arrangement should be a 3.5 percentage point reduction

or a reduction by 30 %, whichever reduction is the highest. GSP is a development instrument that should focus on helping developing countries overcome poverty by developing their economies; tariff reductions are the cornerstone of this goal without undue regard to the interests of a Community Industry that is sufficiently protected through the graduation mechanism and multilateral trade defence instruments.

a business association

Belgium

Trade association: Man-made fibres

No

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

There is no need to change the existing product categories nor the treatment given to sensitive products.

a business association

Belgium

Textiles & Clothing

T&C specificities and sensitivities should be fully integrated in the new GSP. It is evident that the countries with higher rates of GSP utilization (eg. India, Brazil, Bangladesh, Vietnam, Pakistan, Sri Lanka) are also, along with China, the leading suppliers of T&C worldwide. The new GSP should take into full consideration the higher level of development demonstrated by these countries in T&C and thus limit or exclude the given preferences. The noteworthy concentration of GSP utilization in T&C is a clear indication of the expansion and maturity of our industry in these countries. This said the new GSP regime should also encourage economic diversification in developing countries by promoting the expansion of upcoming industries.

a business association

Belgium

EUROCHAMBRES, the Brussels-based Association of European Chambers of Commerce and Industry EUROCHAMBRES is the sole European body that serves the interests of every sector and every size of European business and the only one so close to business. EUROCHAMBRES has member organizations in 45 countries representing a network of 1,700 regional and local Chambers with over 19.8 million member companies. Chamber members employ over 120 million employees.

Yes. The GSP regime should be based on objective development criteria and not be based on sensitive or note sensitive products for the EU industry. To make the system easier and more comprehensible a greater amount of goods should be included in the GSP and a tariff reduction of 3.5% for “sensitive” products should be considered. It is important that developing countries are given the opportunity to not only export raw materials but also more processed goods and services, which will provide more employment and greater economic growth. It is also important to delete all the remaining duties that are 3% or lower when a customs duties reduction of 3.5% is given. “Nuisance duties” are not administratively justifiable to preserve.

a business association

Belgium

The CEFS (Comité Européen des Fabricants de Sucre) represents all European sugar manufacturers and refiners among the European Institutions (Council of Ministers, European Commission, European Parliament, Economic and Social Committee, etc.) and among different international organisations (FAO,WTO,etc.)-Since December 2009 CEFS is registered as interest representative (Identification number in the register: 49679062863-35). .

A. The sensitiveness of sugar and high sugar content products should continue to be maintained in particular for the reasons already mentioned in Q6.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

In order to further simplify the GSP and enhance its acceptance as a tool for development, no more distinction should be made between “sensitive” and “non-sensitive products”. For the same reasons, sectoral or product-specific exclusions should no longer be contained in the scheme. There is still considerable scope in eliminating duties under the GSP. Duties should be totally suspended where preferential treatment results in ad valorem duties of 3% or less, or in specific duties of € 5,- or less (“nuisance duties”).

a business association

Belgium

Representing the foreign trade interests of European retail trade

Yes, the treatment of sensitive products should be adjusted. Sensitive products should be subject to a 50 percent reduction from MFN rates (including textiles). Furthermore, duties should not be levied when preferential treatment results in duties of 3 percent or less.

a citizen

Belgium

Finance

Yes

a company

Belgium

Import of food items

" Sensitive " products is showing more clearly that this is aimed as well as protectionism as as neo-colonialism. All this should be unnecessary if EU importers were willing to pay fair prices for products of developing countries, as such giving them a much better and practical boost for their local economies etc without having to use hand-outs to those people and countries under the denomination of developing aid(s)...

a no profit organisation

Belgium

Agricultural and Agrifood Trade

The distinction between “sensitive” and “non sensitive” products should be coordinated with the tropical products WTO-established category. CELCAA also believes that it is important to maintain the sensitivity of the agricultural sector in the new GSP Regulation.

a no profit organisation

Belgium

Economic justice

The number of sensitive products and the tariffs imposed on them should be reduced in order to preserve and enhance the pro-development aspect of GSP.

a no profit organisation

Belgium

COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

The categorization of products into “sensitive” and “non sensitive” should be coordinated with the WTO-established category of tropical products.

other

Belgium

Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)

There are a number of inconsistencies in the GSP distinction between sensitive and non-sensitive products which hinder the effective use of the system. The following in particular should be addressed:

(i) Lack of transparent criteria: The absence of a definition of what is considered “sensitive” and “not-sensitive” yields a lack of legal certainty and predictability. If this distinction amongst products is maintained, objective benchmarks should be adopted and published on which all GSP stakeholders should be consulted. The current list is outdated and a regular in-depth

review is required at the latest when a new Regulation is adopted rather than at the time of the Framework Regulation.

(ii) Differentiation between textiles and other goods: No distinction should be made between textiles and other products. Textiles are a crucial sector and an essential element of a genuine development plan for many countries. The abolition of the distinction will render the system more user-friendly, equitable and transparent.

(iii) Differentiation between sensitive and non-sensitive: For all sensitive products, the reduction granted under the General Arrangement should be a 3.5 percentage point reduction or a reduction by 30 % whichever the highest reduction is. The GSP is a development instrument that should focus on helping developing countries overcome poverty by developing their economies; the tariff reduction should be commensurate to the goal without regard to the interests of the Community industry that is sufficiently protected through the safeguard clause, the graduation mechanism or other trade defence instruments.

other

Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)

Any considered adjustment shouldn't diminish GSP as a development instrument. Preferential tariffs can't be lowered in general. This is particularly important for developing countries, being confronted with the blocked Doha Development Round and the very difficult EPA-negotiations (for the ACP-countries).

other

Belgium

advising our members, interest representation ---- Cefic

No, the categories should be maintained - but they should be differentiated by countries which are strong already now. GSP targeted on countries that most need it

a no profit organisation

Belgium, Brussels

leather sector. COTANCE represents interests of National Associations of Tanners and Dressers

For sensitive products the GSP duty rate should in any circumstance never go below 1%. EU industry interests at sector level needs to be checked prior to the full removal of tariff protection for any product, it cannot be the result of a simple calculation, rounding and de minimis exclusion! A percentage reduction on the MFN duty applied on a product, such as for textiles and clothing, is the correct system. GSP duty rates that are 3.5 percentage points lower than EU MFN rates makes that many products with low duties lose their tariff protection totally.

a no profit organisation

Bolivia

Exportaciones

Las industrias de los países en desarrollo no amenazan por su tamaño a las industrias de los países desarrollados por lo tanto el SGP debería ampliarse a todos los productos con potencial exportable de los países en desarrollo.

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

Debería existir un ajuste que considere la reducción arancelaria de los productos sensibles y la reducción de los gravámenes arancelarios específicos.

a no profit organisation

Bolivia

industry

Duties reductions for sensitive products should be increased and specific tariffs should be lowered as well.

other
BOLIVIA
EXPORTS ---- Government representative
Yes. Specially considering the needs of lest developed countries.

other
Bolivia
Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio
Las industrias de los países en vías de desarrollo no amenazan por su tamaño a las industria de los países desarrollados por lo tanto se debería ampliar el SGP a todos los productos con potencial exportable de los países en desarrollo.

a business association
Brazil
industrial sector
FIESP recognizes that some products are still going to be considered "sensitive". However, the range of non-sensitive products should be dramatically increased especially for agricultural products, which are the most responsible for economic development in low income countries.

other
Brazil
Government ---- Ministry of External Relations - Federative Republic of Brazil
The EU GSP does not present either a clear justification for the rationale of inclusion of some tariff lines instead of others. The present regulation refers, moreover, to the issue of sensitivity of products concerning the situation of sectors manufacturing the same products in the Community, so providing tariff exemption in cases of non-sensitivity and tariff reduction by 3,5% for sensitive products (Article 6 of the EC 732/2008), under the General Arrangement. The criteria to define "sensitivity" is unfortunately neither described nor mentioned in the European GSP.

a business association
Brussels
steelmaking
European steelmaking heavily relies on imports of key metallurgic raw materials such as ferro-alloys (from Brazil, Argentina, China, Egypt, Indonesia, India, Kazakhstan, Ukraine, Uzbekistan, Venezuela and Zimbabwe) Qualification of "sensitive" products taking into account "the situation of the sectors manufacturing the same products in the Community" needs to be transparent including an assessment in view of the objectives of the Commission's "Raw Materials Initiative"

a company
Cambodia
Export
No comment.

other
Colombia
Tourism and Trade (Import-Export) ---- Government of Colombia
Colombia agrees that the treatment of sensitive products should be adjusted in the current standard GSP. For many of these products, a better tariff treatment to enter the European market can provide a valuable opportunity to strengthen exports, without putting at risk the EU production. In our opinion, lists of sensitive products have not been updated and do not take into account actual conditions of production and competition of similar products in the EU. Colombia has identified in the annexed list tariff items recommended to be excluded from the category of sensitive products of the standard GSP. (please consult the list that has been sent to the following adress: TRADE_GSP_Consultation@ec.europa.eu)

a business association
Ecuador
Ecuadorian Exportes Federation

Para ampliar y mejorar el acceso de productos originarios de países en desarrollo a la UE se deberían incluir los productos actualmente excluidos en el SGP. De ser necesario esos productos aún pueden contar con un trato como sensibles dentro del esquema. Aquellos que productos que actualmente son considerados sensibles pueden mejorar los márgenes mediante la ampliación de la preferencia y la eliminación combinada de aranceles ad-valorem y específicos.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

In order to deepen the access to the Union European of products originating in developing countries, the products which at the moment are excluded of the standard SGP should be included, which could be recognized as sensitive where appropriate; meanwhile, those that at the moment are considered sensitive products should be recognized as non-sensitive. For products considered sensitive, it would be possible to enhance the margin of preference: (10% ad valorem tariff; 20% textiles; and, 40% specific tariff).

a business association

Finland

Trade Policy

Analysis and preparation of possible adjustment of the treatment of sensitive products should be done together with the EU business in line with the current regime.

a business association

Finland

Pulp, paper, paperboard and wood products industries interest representation

The Finnish Forest Industries Federation would like to bring up that the Russian pine plywood (CN 4412 3900), birch plywood (CN 4412 3210) and LVL (CN 4412 9985) should be excluded from the GSP. These product categories are sensitive ones for the Finnish Forest Industries Federation's member companies, which manufacture these above mentioned products in Finland. The new GSP should be developed to serve better the least developed states, which need more support from the EU. Russia, as a high-income country, should be excluded from the GSP.

a company

Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.

Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products

Sensitive products category should be kept or these sensitive products should be excluded from the regime altogether. As regards wood products, the categories CN 4412 3900, CN 4412 3210, CN 4412 9985 should be removed from the scheme and be subject to MFN treatment.

a business association

France

MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies

No, the current categories should be maintained.

a business association

France

Textile

The textile and clothing products are considered like "sensitive products" and have a reduction of 20% from MFN duties. It's important to take account the level of textile industry competitiveness of the beneficiary country in order to exclude these countries from GSP system.

a business association

France

Fishery products - Tuna

No - Tuna products should remain highly sensitive in the standard regime.

a company

Germany

chemical sector

There is no need to alter the current classification systems. Attention should however be paid whether, due to newly economic reality anno 2010, a proper (re)classification of products is necessary between "non-sensitive" and "sensitive" (or vice versa). For this exercise, also the chemical industry needs to be fully involved.

a company

Germany

Think-tank for European and international economy and governance

yes

a company

Germany

The difference between sensitive and non-sensitive products should be maintained (for automotive products defined as sensitive in the current regulation - 3,5%). As regards the coverage of products, we think from a principle point of view that all product lines should be subject to GSP (no exclusions). This could give additional incentives for developing and least-developed countries and make the scheme clearer and easier. However, we understand that for political reasons- and similar to EBA - arms shall be excluded from the GSP scheme altogether.

a company

germany

chemical production

no

a company

Germany

production of fine chemicals on request - toll manufacturer for fine chemicals

I would do it the otehr way around: make sure that products are produced everywhere in the world under the same high quality standards, including protection of the environement and ethical standards. This will be the biggest step foreward in developing countries and saving the world.

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

No, the categories should be maintained - but they should be differentiated by countries which are strong already now.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

It is essential that the new GSP regulation should continue to consider the sensitivity of those products of vital importance for the EU production.

For the processing and trading sector of fishery and aquaculture products, it is vital that the canned tuna and tuna preparations continued to be very sensitive products. For countries falling under the standard GSP (general arrangement), tuna products, as sensitive products, should be excluded from this regime.

A tariff reduction under the standard GSP (general arrangement) would have a negative impact both on the EU industry and on the industry of the GSP + countries. If happened, in spite of establishing graduation mechanisms, withdrawal instruments and safeguard measures, the competitiveness and viability of the EU industry and the industry of the GSP + countries would be affected sensitively.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

It is essential that the new GSP regulation should continue to consider the sensitivity of those products of vital importance for the EU production. For the processing and trading sector of fishery and aquaculture products, it is vital that the canned tuna and tuna preparations continued to be very sensitive products. For countries falling under the standard GSP (general arrangement), tuna products, as sensitive products, should be excluded from this regime. A tariff reduction under the standard GSP (general arrangement) would have a negative impact both on the EU industry and on the industry of the GSP + countries. If happened, in spite of establishing graduation mechanisms, withdrawal instruments and safeguard measures, the competitiveness and viability of the EU industry and the industry of the GSP + countries would be affected sensitively.

a no profit organisation

India

Research in International Economic Relations

Generally a five percent tariff difference is regarded by the trade to be significant enough to make a difference. The preferential tariff margin for sensitive products attracting ad valorem tariffs should be scaled up from 3.5 to 5 percentage points in light of what has been stated in response to Q.9.

a no profit organisation

Italy

Education and Research

Absolutely yes. Especially since GSP can pursue other targets from the original ones.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

I believe so. Especially in the light of the total reduction in Trade volume, since the financial crisis.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

No. Sensitive products are not only sensitive for the EU industry, but they are also products of interest for export to the Union's markets from the LDC's and GSP+'s beneficiaries. Therefore, a preferential margin for the LDCs in respect to the other developing countries should be maintained. Reduction of the list of sensitive products or granting additional preference related to these products in the general arrangement would result to preference erosion for LDC's and GSP+'s beneficiaries. Thus the objective of the GSP to be targeted towards the poorest countries would be undermined and the incentives for sustainable development and good governance weakened.

a company

Malaysia

Textile

Yes

a company

Malaysia

Export Pepper

No comments

a company

Malaysia

Screw, Nut & Washer
No

a company
Malaysia
Manufacturer of furniture
No comment.

a company
Malaysia
Manufacturing
yes. we should review the list of sensitive product. IT may no longer become sensitive now as the list was develop quite some time ago.

a company
Malaysia
Manufacturer
Yes

other
Malaysia
International trade and industry ---- Ministry of International Trade and Industry Malaysia
The current standard GSP regime should be maintained.

other
Mauritius
International Trade ---- Government official
No

a company
Myanmar
Information Supply
Yes.

other
Panamá
Servicio ---- Ministerio de Comercio e Industria de Panamá
Los flujos comerciales de Panamá con la UE han sido promovidos en su gran mayoría bajo el Régimen del SGP. En tal sentido, un alto porcentaje de las exportaciones panameñas hacia la Unión Europea son beneficiadas de aranceles preferenciales establecidos en este programa. Los productos tales como: sandía; melón; papaya; y harinas, polvo y pellets de pescado que representan aproximadamente el 80% de las exportaciones de Panamá hacia la UE se encuentran incluidos dentro del SGP pagando aranceles inferiores al NMF aplicado a terceros países. Sería deseable incluir a la categoría de sensibles nuevos productos, tales como: carne bovina, carne porcina, banano, azúcar y derivados de los lácteos.

a company
Qatar
Liquified Natural Gas
No comment.

a business association
Spain
Fisheries
Although simplification is needed, the current standard GSP regime must be maintained.

a business association
Sweden

The Association of Swedish Chambers of Commerce representing Swedish companies. The Swedish Chambers of Commerce are regional, independent, non-profit making organizations, funded by the members.

Yes. The GSP regime should be based on objective development criteria and not be based on sensitive or note sensitive products for the EU industry. To make the system easier and more comprehensible a greater amount of goods should be included in the GSP and a tariff reduction of 3.5% for “sensitive” products should be considered. It is important that developing countries are given the opportunity to not only export raw materials but also more processed goods and services, which will provide more employment and greater economic growth. It is also important to delete all the remaining duties that are 3% or lower when a customs duties reduction of 3.5% is given. “Nuisance duties” are not administratively justifiable to preserve.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q. 10. The notion of sensitive product has to be dismantled. The most important products for developing countries such as Pakistan or Bangladesh is discriminated against in the GSP. Disgraceful! With our proposal, a good origin rule, and limiting the system to LDC:s and countries eligible to GSP Plus, all these precaution regulations, all protectionist regulations, and superficial bureaucratic regulations can be left aside. In a good world there are no duties.

other

Switzerland

Policy research and negotiation assistance ---- International organization

We do not directly oppose the categorization of products into 'sensitive' or 'non-sensitive'. However, a more transparent and simple scheme could simply exempt all duties (as is the case with the US GSP). Secondly, the tariff preference for non-sensitive products is less generous for than sensitive products, while we would expect the contrary.

The difference between sensitive and non-sensitive is largely the difference between products with a high MFN tariff and products with a low MFN tariff. The vast majority of ‘non-sensitive’ products are those products that have a low MFN tariff (lower than 3.5%) while sensitive products have a higher MFN rate. Examples of non-sensitive products are crude oil (HS 270900, 0%), rubber (e.g. HS 400122, 400129, 0%) and non-coniferous lumber (HS 440799, 2.5%). In order to have the same benefit, most non-sensitive products should in fact enjoy a negative duty (refund).

other

Syrian Arab Republic

Customs ---- Government sector

I am not able to answer this question because its application field is not so clear to me

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

With the preference erosion progressively undermining the attractiveness of preferential regimes, Thailand suggests that the new GSP scheme provide a bold incentive to beneficiary countries by offering sound trade liberalisation. Furthermore, the selected criteria of country coverage need to be based on objective development criteria (Thailand’s GDP per capita) and not on sensitivity or the country’s import threshold.

With regard to the product coverage under the new GSP scheme, Thailand suggests that:

- (i) a wider coverage of products be included preferably to encompass all products imported from Thailand;
- (ii) there should be no sectoral or product-specific exclusions;
- (ii) a list of tariff lines permitted duty-free access should be expanded;
- (iii) more “sensitive” products be allowed to receive preferential access;
- (iv) more “sensitive” products be redefined as “non-sensitive” products;
- (v) a general reduction should be higher than 3.5 per cent point (e.g. 4%) under the new scheme and

(vi) same (low) rate of reduced tariffs be applied equally to all sensitive products including textiles.

a citizen

UK

Economic research

Duty free for all. And it is misleading as well as arrogant to call the rates 'generous': low or 0 tariffs benefit the EU countries at least as much as the exporters, so there is no question of 'generosity'.

a company

UK

Import and Distribution

yes. I don;t know enough about sensitive products to give a thorough explanation but my feeling is that it is confusing.

a no profit organisation

UK

Development Education, campaigns + advocacy

The governing principle of the GSP scheme should be that any trading arrangement adopted must maximize benefit for the least advantaged partner. Arrangements regarding 'sensitive' products should be viewed in this light. The list of such products should be reduced, with a view to being phased out altogether, given that such special protection, almost by definition, is designed to exclude products from less wealthy countries.

a business association

United Kingdom

Seafood importation

No comment

a business association

URUGUAY

CITRUS EXPORTS, SPECIALLY TO THE EU

The scheme of generalized tariff preferences constitutes a general arrangement and has been appointed to promote sustainable development and good governance.

The differentiation of the preferences between non-sensitive and sensitive products take account of the situation of the same products/sectors within the EU.

Uruguay is beneficiary of the GSP and one of our principal fruit fresh products to the EU is MANDARINES (08 05 10 00) under counterseason scheme.

The citrus sector in Uruguay has been exporting mandarins to the EU from more than 35 years, always under the GSP regime and being included within the "sensitive" list. This inclusion was possibly focused on the competition between Mediterranean mandarins growers and southern hemisphere mandarins.

By the time of entering into force of the new GSP Regulation, competition from other suppliers from the Southern Hemisphere will certainly be a threat to Uruguayan mandarine business. Under Bilateral Arrangements between the EU and SouthAfrica, Chile and Peru, mandarins will have 0 % tariff while Uruguay will keep 12,5 % treatment. According to EC Commission statistics (AGRI.C.2 / AGR19 / 09), historical seasonality is showing that supply from Uruguay is concentrated between end of March and end of September and accounts for around 20 % of total supply from the Southern Hemisphere.

Our sector has been permanently adjusting to new EU requirements to become trustable suppliers; we are faced to free competition and fulfill market and clients expectations in quality, safety and social responsibility. This new situation with uneven tariff rates will certainly have a negative impact for our high-human-demanding sector under non-equivalent market rules.

In summary, the co-existence of parallel import regimes, our competitors (some of them major global actors in the fruit international market) being under Bilateral Agreements with 0 % tariff and Uruguay maintaining 12,5% is a clear obstacle to access the market. For these reasons the Citrus Chamber of Uruguay, which accounts for more than 90 % of total citrus exports,

considers it is very important that the treatment of “sensitive products” have to be adjusted to the new scenario.

Q11: What could be the major characteristics of countries that “most need GSP preferences” considering that preferences must be “generalized and non-discriminatory”?

a no profit organisation

Argentina

Export services

For all developing countries, without taking into account its developed level, the GSP is a necessary and main instrument. Therefore, the major characteristic for the most need GSP preference is to be considered a developing country.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Ziel sollte sein, punktgenauer tatsächlich unterstützungswürdige Entwicklungsländer zu definieren und gleichzeitig bereits höher entwickelte Länder entweder zur Gänze oder für jene Produktgruppen, in denen sie bereits ausreichend wettbewerbsfähig sind, aus der Anwendung auszunehmen. Schwellenländer sind nicht mehr primär unterstützungswürdig. Die derzeit festgelegten Schwellen (zB Importanteile) für die Gewährung des APS sind absolut ausreichend und bedürfen keiner Anhebung. Die gewählten Kriterien sind objektiv und unter dem Grundsatz der Gleichbehandlung zu wählen und anzuwenden.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

THE DETERMINATION SHOULD HAVE ONLY TWO CRITERIA - 1. INCOME PER HEAD - UNDER A CERTAIN LEVEL 2. NATURAL DISASTORS PRESENCE LEVEL

a business association

Belgium

Renewable energies

Emerging biodiesel exporting countries, mainly Central American and West African countries, are beneficiaries of the GSP+ or Everything But Arms, are in need of the development opportunities provided under GSP+ and EBA.

a business association

BELGIUM

NITROGEN FERTILIZERS

Level of National income level of technological plant equipment

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

Beneficiary countries should be low incomes economies and lower- middle income economies. The WTO has defined a group of countries as “weak and vulnerable” and a group of “least developed countries” which corresponds to this definition. The competitive emerging economies and high income countries should not be part of this group.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

It is difficult to propose criteria but as a matter of principle, we would suggest to stick to the definition of LDC's which are the countries who definitively need it the most.

a business association

Belgium

Trade association: Man-made fibres

Level of income, index of poverty, distribution of wealth

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

Beneficiary countries should abide by the international rule-based trade system. The operation of domestic policies that create systemic trade distortions should be sanctioned by the withdrawal of preferences for the products to which these policies apply.

a business association

Belgium

Textiles & Clothing

We should take into consideration the average levels of income, the development rate but also the levels of industrialization, including in specific sectors, the government support to business and the policy towards important issues like access to raw materials, export subsidies, public procurement, FDI and IPR protection.

a business association

Belgium

EUROCHAMBRES, the Brussels-based Association of European Chambers of Commerce and Industry EUROCHAMBRES is the sole European body that serves the interests of every sector and every size of European business and the only one so close to business. EUROCHAMBRES has member organizations in 45 countries representing a network of 1,700 regional and local Chambers with over 19.8 million member companies. Chamber members employ over 120 million employees.

For the preferences to be considered as “generalised and non-discriminatory”, they must be based on objective development criteria, e.g. GDP per capita. Such a system would be simple and predictable while not excluding big but poor countries.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

The question which countries are most in need of GSP preferences should be answered by criteria related to development, not sensitivity. A country's size, its export volumes or its share in total GSP-covered imports should not per se hinder its acceptance as GSP beneficiary. Otherwise, the EU would exclude bigger but poor and commodity-dependent suppliers. EuroCommerce calls for the application of objective development criteria, e.g. the GDP per capita. However, should the European Institutions opt for import share as a suitable criterion, we strongly recommend a high percentage for all products. Lower percentages for individual products or groups of products would most likely be seen as inspired by protectionist considerations.

a business association

Belgium

Representing the foreign trade interests of European retail trade

Relevant for the question if countries are most in need of GSP should be the objective development of a country. The application of the GDP per capita seems decent. In exceptional cases also the overall economic situation should be taken into consideration.

a citizen

Belgium

Finance

Don't know

a company
Belgium
Import of food items
Tricky question : GSP will always create non-generalized and thus : discriminatory effects...

a no profit organisation
Belgium
Development NGO
Countries' BNP, measure of diversification, numbers of poor people depending on the export of the product

a no profit organisation
Belgium
Agricultural and Agrifood Trade
No comment.

a no profit organisation
Belgium
Economic justice
A low GDP per capita, a low share in world trade, and a low market share in Europe.

other
Belgium
advising our members, interest representation ---- Cefic
Countries in need of tariff preferences are the Least-developed economies (LDCs), according to World Bank categories. This categorization is based on objective and understandable criteria.

a no profit organisation
Belgium, Brussels
leather sector. COTANCE represents interests of National Associations of Tanners and Dressers
Countries that most need GSP preferences are those where for individual products they have a low participation in the international trade for the concerned products.

a no profit organisation
Bolivia
Exportaciones
Los países sin litoral y en vías de desarrollo.

a no profit organisation
Bolivia
Trade and export promotion, export companies advice
Those countries that are considered commodity exporters and are developing their agro-industrial sector, so they require markets for their added value products.

a no profit organisation
Bolivia
Representación de todos los Despachantes de Aduana de Bolivia.
Las características que deberían considerarse para ser considerado un país que más necesita del SGP son: ser país sin litoral y país en vías de desarrollo.

a no profit organisation
Bolivia
International Trade Promotion and Technical Assistance
Those countries that are considered commodity exporters and are developing their agro-industrial sector, so they require markets for their added value products

a no profit organisation
Bolivia
industry

It's low exports diversification, low added value to its exported goods the lack of a long term agreement with the EU

other

BOLIVIA

EXPORTS ---- Government representative

- Low income - Few Exports - High unemployment

other

Bolivia

Government ---- Government Official

The countries that "most need GSP preferences" are those where the exports to the European Union are not significative in value, not enough diversified, countries without a bilateral trade agreement with the EU, and where the international Conventions required by the Regulation are being implemented but still need to be reinforced. These are also countries that would otherwise lack tax preferences and that need them to continue developing in order to improve their trade relations with the European Union that could result in mutual benefit for both parties

other

Bolivia

Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio

Los países sin litoral y en vías de desarrollo.

a business association

Brazil

industrial sector

The currently used criterion of income should be maintained.

other

Brazil

Government ---- Ministry of External Relations - Federative Republic of Brazil

It is important to have clear understanding that excluding some countries in detriment of "most needed" countries does not have the effect of really benefiting the latter, as the export profiles do not often match.

a citizen

Cambodia

Garment Industry

Lest Developing countries

a company

Cambodia

Export

They have to respect the international rules of law such as Children and woman protected rules and labor law of the ILOs.

other

Colombia

Tourism and Trade (Import-Export) ---- Government of Colombia

The countries that need the most the GSP preferences are those who are actually engaged in combating the production and drug trafficking and derived terrorism. It is the best way to express them our shared responsibility in front of the most serious scourge of humanity. For poor countries, the money generated from the production and trade of illicit drugs causes imbalances and violence in society that deserve all the global support in order to overcome these situations.

One of the best ways to do so is trade, especially of agricultural products. You might even think of drawing up a scheme giving greater incentive to substitute crops of illicit crops or programmes that encourage the eradication of illicit crops in rural areas. In Colombia we have two programs that deserve any kind of support, such as "Familias Guarda Bosques" and the

manual eradication of illicit crops. Similarly, Colombia considers the scheme granted to SME's which promotes tariff-free entry for all the EBA products devised by them to be important.

a business association

Ecuador

Ecuadorian Exportes Federation

Países con menos acuerdos comerciales suscritos y que dependen de esquemas preferenciales unilaterales no recíprocos como el SGP y que mantienen una clasificación en el Banco Mundial una clasificación no mayor a países que tengan máximo ingresos medios altos.

a business association

Ecuador

Tuna Industry

Level of development; level of job providing.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

The GSP should be targeted on those countries which have been classified by the World Bank at most as upper-middle income.

a business association

Finland

Trade Policy

Income.

a business association

Finland

Pulp, paper, paperboard and wood products industries interest representation

Both the level of a country's GDP and GDP per capita.

a company

Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.

Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products

Characteristics of Least Developed Countries.

a business association

France

MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies

The countries that « most need GSP preference » are the LDCs as defined by the World Bank.

a business association

France

Textile

The level of industrialization and the exports by products. Graduation must be applied to groups of products from countries that are competitive on the community market and no longer need the GSP to boost their exports. Graduation is not a penalty.

a business association

France

Fishery products - Tuna

Lesat developed contries and countries who make efforts to obey to human rights, labor, environment and social rules equivalent to EU rules

a business association

Germany

Industry

Countries in need of tariff preferences are the Least-developed economies (LDCs), according to World Bank categories. This categorization is based on objective and understandable criteria.

a company

GERMANY

PHARMA/CHEMICALS

We are supporting the opinion that countries in need of tariff preferences are the Least-developed economies (LDCs). The categorization should be based on objective and understandable criteria. We consider that the LDCs classification by the World Bank could be used in this respect.

a company

Germany

chemical sector

Several international organizations, such as for example the World Bank, dispose of very useful classifications systems for LDCs. In our opinion, the LDC classification by the World Bank could be used for this, as it is based on objective and widely accepted criteria.

a company

Germany

Think-tank for European and international economy and governance

poverty, economic uphill struggle, democracy, human rights, governance, anti-corruption efforts, but also geographical closeness (ENP countries, Central Asia etc.; countries without raw material to sell (oil, gas etc.) but with political new efforts (like e.g. Kyrgyzstan, Tajikistan)

a company

Germany

GSP should be granted to all developing and least-developed countries. High-income countries should be excluded. The calculation of diversification of exports should be changed (and take into account the country's total exports instead of only exports covered by the GSP). When reaching a certain level of competitiveness in specific sectors, countries should be excluded from preference treatment.

a company

germany

chemical production

The preferences shall be linked to fair working conditions for the workers in developing countries comparable to those in the EU, esp. for occupational health, safety and environmental protection.

a company

Germany

production of fine chemicals on request - toll manufacturer for fine chemicals

Africa

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

Countries in need of tariff preferences are the Least-developed economies (LDCs), according to World Bank categories. This categorization is based on objective and understandable criteria.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

The level of development of the countries could be the main characteristic to consider those countries that “most need GSP preferences”. The vulnerable countries and least-developed countries should be the main beneficiaries from the GSP Scheme.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

The level of development of the countries could be the main characteristic to consider those countries that “most need GSP preferences”. The vulnerable countries and least-developed countries should be the main beneficiaries from the GSP Scheme.

a no profit organisation

India

Research in International Economic Relations

Since the removal/reduction of poverty is the declared objective of EU GSP the recipient countries that have the largest incidence of poverty need GSP most. Modulation of GSP benefits on the basis of poverty levels in the recipient countries would, therefore, make a great deal of sense and would not be subject to challenge on the ground of discrimination. On the other hand, modulation of benefits on the basis of competitive need or market share does not make sense as these criteria are unrelated to the central objective of alleviation of poverty.

other

India

Higher Education ---- An Academic in a Central University, under the HRD Ministry, Government of India

1. Low per capita income 2. Liberal democracies 3. Pre-dominantly agricultural 4. With potential for growth

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

Low per capita GDP High Balance of trade deficit.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

We believe, that there is a need to explore different sources of economic development indicators (World Bank, IMF, GSP/per capita) for selecting countries which are most in need.

a company

Malaysia

Export Pepper

Less developed countries in Africa and Central America

a company

Malaysia

Manufacturing

1) A country who always in the internal war. 2) A country with low GNI.

a company

Malaysia

Manufacturer of furniture

Those countries with the GDP lower than US\$8,000

a company

Malaysia

Manufacturing

Developing countries with per capita income of less than USD 20,000

a company
Malaysia
Manufacturer
developing countries

other
Malaysia
International trade and industry ---- Ministry of International Trade and Industry Malaysia
The major characteristic of countries that 'most need GSP preferences' depends on the background of the economy and environment to create and improve good governance.

other
Mauritius
International Trade ---- Government official
High export concentration on few sectors, physical isolation, minimal share on the EU market, inadequate infrastructure, high transport and transit costs remoteness to main market amongst others

a business association
Myanmar
Garment and Apparel Manufacturing
According to my understanding, "countries that most need GSP preferences" stands for the people of those countries. In order to be generalized and non-discriminatory, EU should take into account, not only the government (ruling party) actions but also the consequences on the people of the country. In the case of Myanmar, it can be clearly seen that all aspects of sanctions targeted the regime but affected the people and their growth.

a citizen
Myanmar
observer
Especially for developing countries, which they are difficult to compete in world market as less capacity, poor infrastructure

a company
Myanmar
Information Supply
Must be classified as low development.

other
Panamá
Servicio ---- Ministerio de Comercio e Industria de Panamá
En vista que las preferencias del SGP son generalizadas y no discriminatorias, las características que podrían reunir los países que más necesitan este programa, deben ser consideradas en base a los niveles de pobreza, valor absoluto de las exportaciones nacionales, desempleo abierto, tamaño de economía y bajo nivel de diversidad de la oferta exportable.

a company
Philippines
Agriculture and Aquaculture
developing and tropical countries should be given the preferences. We have enough sunshine with no winter and area is suitable for agri and aqua endeavors provided facilities, infrastructures, post harvest and processing plants, marketing etc. would come with the package

a company
Qatar
Liquified Natural Gas
No comment.

a business association

Spain

Fisheries

Countries that “most need GSP preferences” exporting big amounts of fishery products to the EU market, such as Pangasius in the case of Vietnam, must not benefit from the GSP regime.

a business association

Sweden

The Association of Swedish Chambers of Commerce representing Swedish companies. The Swedish Chambers of Commerce are regional, independent, non-profit making organizations, funded by the members.

For the preferences to be considered as “generalised and non-discriminatory”, they must be based on objective development criteria, e.g. GDP per capita. Such a system would be simple and predictable while not excluding big but poor countries.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 11. Direct GSP towards LDC:s and GSP Plus eligible countries only. What will happen also is that India and the band of new protectionists might be interested to discuss tariff in the Doha-round when it eventually is restarted in a few years time. As thing stand now they are happy to use GSP and keep China back it helps from a competition point of view.

other

Switzerland

Policy research and negotiation assistance ---- International organization

We are in favour of making eligibility and/or benefits dependent on development benchmarks. Secondly, the principle of ‘ownership’ applied to the GSP regulation implies that countries should be able to select the exports which should receive preferential treatment, instead of fixing this within the GSP regulation. The size of benefits could be based on development benchmarks and applied to the exports of the last 3 years. This would remain valid at least 5 years after which a country could submit a change request.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

Thailand is of the view that the major characteristic of countries that must be economically vulnerable is that it must not be classified as a high-income country under the World Bank’s categorization system which divides countries into four categories (including low income, lower-middle income, upper-middle income and high income) according to their GNI per capita calculated using the World Bank Atlas method. Based on the World Bank’s database, Thailand is classified as lower-middle income country.

In 2008, Thailand had a GNI per capita of US\$3.670,00 which is far below the level of high income countries. Furthermore, such amount does not reflect the country’s regional differentials with the capital city of Bangkok accounting for about 60 per cent of national GDP. The average income in Bangkok and vicinities was at US\$9.342,00 while the lowest average income were at US\$2.032,00 and US\$1.208,00 in Northern and Northeastern regions respectively.

Thailand’s ranking according to the UNDP’s Human Development Index (HDI) of 2009, which determines the fundamental aspects of people’s lives and opportunities including life expectancy, literacy rate and school enrollment ratio, is the 87th out of 182 countries (between Azerbaijan at the 86th and Iran at the 88th). Thailand’s HDI ranking shows that, despite its improved development in recent years, there is much more for Thailand to do for its development which is far behind that of developed countries.

a citizen

UK

Construction

Human Rights

a citizen

UK

Economic research

The system is not designed to meet 'need': clearly it would be new exporters of new goods to new markets. The problem with the present GSP system is that it is designed (subject to the protectionist limitations in the EU) to help the countries which are poorest. This is not the same as those who can use trade preferences for development most effectively.

a company

UK

Import and Distribution

Countries that benefit should have a low GDP, low average income per capita, poor levels of literacy and numeracy and should be making an big effort to have a good human rights record

a no profit organisation

UK

Development Education, campaigns + advocacy

LDCs are already recognized as needing special and differential treatment; but such treatment, calibrated according to need, should be afforded to all countries that are (a) less developed (lower GDP per capita or lower HDI) than EU and (b) would otherwise be disadvantaged by the current trading regime, including non-tariff barriers and EU (or other OECD) subsidies. Post-conflict DCs should be regarded as particularly in need.

a business association

United Kingdom

Seafood importation

No comment

a no profit organisation

United Kingdom

animal welfare

In terms of animal welfare, this would be countries with specifically difficult issues of food security, particularly where these could be seen to be linked to climate change.

a company

Uruguay

Tanned sheepskins and garments.

Developing countries.

Q12: Some but not all high-income countries are currently not eligible for GSP. Should this exclusion be extended to all high-income countries? If not, should the current criteria be changed at all?

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Die Anwendung des APS soll stärker auf tatsächliche Entwicklungsländer fokussiert sein und unter Anwendung objektiver Kriterien alle high-income-Länder ausschließen.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

OF COURSE - THIS IS ONLY FOR POOR COUNTRIES WHO NEEDS THIS SUPPORT. WE ONLY FRUSTRATE THE BASIC CONCEPT BY INCLUDING HIGH INCOME GROUP UNDER GSP

a business association

BELGIUM

NITROGEN FERTILIZERS

Yes all high income countries should be excluded even if their economies are not well diversified. Gsp should benefit the poorest economies

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

All high-income countries should be excluded from the GSP. Many of these countries have higher per capita GDP than some EU Member States. Giving these high income countries GSP benefits makes no sense.

a business association

Belgium

representation of interests of the EU food and drink industry

Beneficiaries declared as “high-income countries” by the World Bank should be automatically excluded from the system. However, a transitional period should be foreseen for predictability reasons (1 or 2 years, which generally covers the contract period for raw materials).

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

As a matter of principle, all high-income countries should be excluded from the scheme.

a business association

Belgium

Wood products

No, because the system does not take into account enough the domestic European industry. An extension of the GSP only ignores more the challenges for the domestic industry. Moreover, these high income countries will further orient their export towards the EU instead of to all third countries.

a business association

Belgium

Trade association: Man-made fibres

Yes high income countries must be excluded

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

All high-income countries should be excluded from the GSP.

a business association

Belgium

Textiles & Clothing

Although we are talking about a generalized preferential treatment we cannot be indifferent to the fact that the main GSP beneficiaries are not the least developed countries and in some cases the major beneficiaries are powerful and rising world economies. It is a fact that the Graduation Mechanism is already a correction tool which takes into account different development stages. However we should envisage a reinforcement of the Graduation Mechanism by enlarging the criteria and/or by introducing correction instruments which take into consideration sensitive topics like- access to raw materials, trade facilitation measures, protection and enforcement of IP Rights and FDI safeguard.

a business association

Belgium

To defend the interests of the EU aluminium transformers and consumers in the domains of EU policy of relevance for the sector

Exclude from GSP high income countries.

a business association

Belgium

EUROCHAMBRES, the Brussels-based Association of European Chambers of Commerce and Industry EUROCHAMBRES is the sole European body that serves the interests of every sector and every size of European business and the only one so close to business. EUROCHAMBRES has member organizations in 45 countries representing a network of 1,700 regional and local Chambers with over 19.8 million member companies. Chamber members employ over 120 million employees.

See the response to question 11 - objective development criteria should determine which countries qualify.

a business association

Belgium

The CEFS (Comité Européen des Fabricants de Sucre) represents all European sugar manufacturers and refiners among the European Institutions (Council of Ministers, European Commission, European Parliament, Economic and Social Committee, etc.) and among different international organisations (FAO, WTO, etc.). Since December 2009 CEFS is registered as interest representative (Identification number in the register: 49679062863-35).

A. Brazil should continue not to be eligible for agro-food products. Regarding the European sugar industry, Brazil is the first sugar producing country in the world.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

As stated in response to question 12, the EU should apply objective development criteria, e.g. the GDP per capita. Once identified, these criteria will then determine which countries qualify.

a business association

Belgium

Representing the foreign trade interests of European retail trade

In principle all high-income countries should be excluded from GSP.

a citizen

Belgium

Finance

No

a company

Belgium

Import of food items

Logically that high(er) income developing countries should be excluded from being eligible for GSP, because then this would have an even counter-productive effect in their development. Now GSP is only serving the rich importing countries which do only want to get access to the cheapest products in order to maximize profit for them and their so-called shareholders

a no profit organisation

Belgium

Agricultural and Agrifood Trade

No comment.

a no profit organisation

Belgium

trade

YES

other

Belgium

advising our members, interest representation ---- Cefic

Yes! As a matter of principle, so-called high-income economies should not be GSP beneficiaries, and this principle should apply irrespective of the diversification of their export structure. It is questionable and unjustifiable that countries such as the Gulf States, with a higher per capita income than some EU Member States, benefit from unilateral tariff preferences.

a no profit organisation

Bolivia

Exportaciones

Si, el SGP debería ser solamente para países en vías de desarrollo.

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

No

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

No debería existir exclusión de las economías altos niveles de ingresos; pero debería darse preferencia a los países en vías de desarrollo para ser considerados como país beneficiario del SGP.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

No

a no profit organisation

Bolivia

industry

yes, the exclusion should be extended to mall high income countries.

other

BOLIVIA

EXPORTS ---- Government representative

No, because this would decrease the opportunities for low-income countries.

other

Bolivia

Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio

Si, el SGP deberá ser únicamente para paises en vía de desarrollo

a business association

Brazil

industrial sector

This exclusion shall not be extended to all high-income countries. Since some of the high-income countries have a very concentrated export profiles, making them more dependent on preferences.

a company

Cambodia

Export

No. It should not.

a business association

Ecuador

Ecuadorian Exportes Federation

La exclusión debe mantenerse a los países de ingresos altos en la medida que su productividad y competitividad le otorgue de hecho un acceso continuo a la UE beneficiándose de factores como economías de escala que favorecen sus exportaciones a los mercados grandes.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

The exclusion should be extended to all high income countries since they normally have the necessary productivity and competitiveness to access the European market with most favored nation duties.

a business association

Finland

Trade Policy

The current criteria should not be changed without common understanding of a more suitable criteria.

a business association

Finland

Pulp, paper, paperboard and wood products industries interest representation

We think that high-income countries should be excluded from the GSP. These states do not need anymore the GSP so much as poorer states do. E.g. Russia is a high-income country and thus does not need the GSP.

a company

Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.

Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products

High income countries should be excluded from the scheme. With them EU should arrange the trade arrangements with bilateral agreements, not unilateral concessions by EU. In particular this concerns countries where there is a strong asymmetry of tariffs between EU and the other country (EU low, other country high tariffs).

a business association

France

MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies

All high-income countries must be excluded from GSP without any exception of country or products. But we can wonder if such definition is enough relevant regarding the economic performances of current competitive exporters. EU should plea to multilateral organizations (IMF and World Bank) to refine their current ranking of Developed countries and LDCs to better differentiate among Developing countries.

a business association

France

Textile

The graduation gives the countries to which it is applied an incentive to do more to diversify their economy.

a business association

Germany

Industry

Yes! As a matter of principle, so-called high-income economies should not be GSP beneficiaries, and this principle should apply irrespective of the diversification of their export structure. It is questionable and unjustifiable that countries such as the Gulf States, with a higher per capita income than some EU Member States, benefit from unilateral tariff preferences.

a company

GERMANY
PHARMA/CHEMICALS

We are supporting the view that the so-called high-income economies should not be GSP beneficiaries. This principle should apply irrespective of the diversification of their export structure. The classification of the World Bank could apply for determining the high-income economies. It is questionable and unjustifiable that countries with a higher per capita income than some EU Member States, benefit from unilateral tariff preferences. For instance, GSP currently benefits states in the Gulf Cooperation Council, even though they sometimes have a higher per capita income than individual EU member states.

a company
Germany
chemical sector

High-income economies (according to for example World Bank classification) should be excluded automatically from GSP preferences, without taking into account the diversification criterion. It is unacceptable that some countries, with a higher per capita income than some EU Member States, are currently still benefiting from EU unilaterally granted tariff preferences.

a company
Germany

Think-tank for European and international economy and governance
normally yes, in view of the world-wide trend of downsizing/even abolition of customs tariffs; this in context with reciprocity (also asymmetric!)

a company
Germany

All high-income countries should be excluded. In this respect, there should be a sector-specific equal treatment.

a company
germany
chemical production

The preferences shall be linked to fair working conditions for the workers in whatever country comparable to those in the EU, esp. for occupational health, safety and environmental protection.

a company
Germany

production of fine chemicals on request - toll manufacturer for fine chemicals
focus on countries routes and bring pressure by standards, but also enforce such standards. The product will not tell how it was made and the melamine case in milk told us that it is even worse: Some analytics cannot detect the fake.

other
Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

Yes! As a matter of principle, so-called high-income economies should not be GSP beneficiaries, and this principle should apply irrespective of the diversification of their export structure. It is questionable and unjustifiable that countries such as the Gulf States, with a higher per capita income than some EU Member States, benefit from unilateral tariff preferences.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

To avoid market disturbs and unfair disadvantage between countries, the GSP scheme should be targeted on the countries that most need it (vulnerable and least-developed countries) The standard GSP (general arrangement) is granted to all beneficiary countries unless they are

classified by the World Bank as a high-income country and where they are not sufficiently diversified in their exports. However it is necessary to take into account that under the GSP general arrangement, there could be countries which are strongly competitive for a specific sector, so in these cases exceptions should be established through the graduation mechanisms, and it should not be granted preferences to those products where these countries are strongly competitive.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

To avoid market disturbs and unfair disadvantage between countries, the GSP scheme should be targeted on the countries that most need it (vulnerable and least-developed countries) The standard GSP (general arrangement) is granted to all beneficiary countries unless they are classified by the World Bank as a high-income country and where they are not sufficiently diversified in their exports. However it is necessary to take into account that under the GSP general arrangement, there could be countries which are strongly competitive for a specific sector, so in these cases exceptions should be established through the graduation mechanisms, and it should not be granted preferences to those products where these countries are strongly competitive.

a no profit organisation

India

Research in International Economic Relations

The twin criteria of high income and lack of diversification of the export basket for exclusion from the GSP benefit appear to be fine. Although fine tuning of these criteria could be contemplated it would be the best to leave unchanged any aspect that does not reveal any irrationality or a basic inconsistency with the objectives.

other

India

Higher Education ---- An Academic in a Central University, under the HRD Ministry, Government of India

No it should not be extended, since they already have an established presence in world trade

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

No. I do not think so. The current criterion seems appropriate.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

The fact that some high income countries currently benefit from the GSP contradicts the objectives of the GSP to be targeted towards the poorest countries and to contribute to poverty reduction. Problems, which exist in some high income countries, consist of undiversified economy and uneven distribution of income, but the GSP is not a right instrument for addressing them. In the contrary, the GSP may even aggravate the situation in the following way: all GSP benefits may go to the already developed sectors and development of other economic activities would not be encouraged. On the other hand, it is probable that the GSP benefits would be received by rich people, which are owners of businesses in these countries, and not transferred to poor people. Therefore, no high income country should benefit from the GSP.

a company

Malaysia

Textile

Yes

a company
Malaysia
Export Pepper
Yes

a company
Malaysia
Screw, Nut & Washer
Current criteria is sufficient

a company
Malaysia
Manufacturing
High income countries should be exclude in GSP regimes. Developing countries is not only facing the problem of lack of financial support, but human resources too. Human capital are not like a machine, can just simply bought from outside. An employee will always seek for working opportunity in a high income countries in order to received higher remuneration package. It can be harmful to developing countries if high income countries still eligible for GSP.

a company
Malaysia
Manufacturer of furniture
No comment.

a company
Malaysia
Manufacturing
All high income countries should be excluded from enjoying GSP benefits. If high income countries able to enjoy the GSP benefits, it contradict to the GSP objectives as set out in the Commission Communication 2004

a company
Malaysia
Manufacturer
yes

other
Malaysia
International trade and industry ---- Ministry of International Trade and Industry Malaysia
The criteria for the GSP eligibility among beneficiary countries should be maintained.

other
Mauritius
International Trade ---- Government official
All high income countries should be excluded from the GSP scheme except SIDS

a company
Myanmar
Information Supply
Needs to determine the limit of what high income should be.

a company
Philippines
Agriculture and Aquaculture
Developed countries should take part on GSP provided they would assist and provide their financial and economic expertise and not or never to compete with the locals

a business association
Portugal

Textile and Clothing Industry

we cannot be indifferent to the fact that the main GSP beneficiaries are not the least developed countries and in some cases the major beneficiaries are powerful and rising world economies. It is a fact that the Graduation Mechanism is already a correction tool which takes into account different development stages.

However we should envisage a reinforcement of the Graduation Mechanism by enlarging the criteria and/or by introducing correction instruments which take into consideration sensitive topics like- access to raw materials, trade facilitation measures, protection and enforcement of IP Rights and FDI safeguard.

Moreover T&C specificities and sensitivities should be fully integrated in the new GSP. It is evident that the countries with higher rates of GSP utilization (eg. India, Brazil, Bangladesh, Vietnam, Pakistan, Sri Lanka) are also, along with China, the leading suppliers of T&C worldwide.

The new GSP should take into full consideration the higher level of development demonstrated by these countries in T&C and thus limit or exclude the given preferences. The noteworthy concentration of GSP utilization in T&C is a clear indication of the expansion and maturity of our industry in these countries.

This said the new GSP regime should also encourage economic diversification in developing countries by promoting the expansion of upcoming industries.

a company

Qatar

Liquified Natural Gas

No comment.

a company

Qatar

Chemicals and Petrochemicals

Higher income countries that have recently undergone rapid development and need more consideration to sustain their progress. Also, importers of products like agricultural and other GSP items should have advantage for their exports into EU.

a business association

Spain

Fisheries

High-income countries investing in EU's fisheries sector should continue to be eligible for SGP.

a business association

Sweden

The Association of Swedish Chambers of Commerce representing Swedish companies. The Swedish Chambers of Commerce are regional, independent, non-profit making organizations, funded by the members.

See the response to question 11 - objective development criteria should determine which countries qualify.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q. 12. See answers above to Q 7. and Q 11.

other

Switzerland

Policy research and negotiation assistance ---- International organization

We would be in favour of excluding all high income countries when this would result in broader benefits for low-income countries

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

Yes. Thailand considers that all high-income countries (classified by the World Bank) should be excluded from the GSP scheme.

a citizen

UK

Economic research

Changing the definition to a simple income one would be a possibility (requiring a longer notice period than is envisaged as this would be a structural change).

a company

UK

Import and Distribution

no high income countries should benefit.

a no profit organisation

UK

Development Education, campaigns + advocacy

Given that it is possible for relatively high income (measured in GDP) to co-exist with great inequality (and therefore serious poverty) within a given state, certain kinds of goods, and certain regions should be considered for special and differential treatment even if the state's overall GDP has risen to 'relatively high' levels.

a business association

United Kingdom

Seafood importation

No comment

a no profit organisation

United Kingdom

animal welfare

High income countries that still have issues of good governance should always be included in the GSP Scheme, Where there is still an opportunity in high income countries to impact animal welfare, and health through the GSP scheme, should still be included, subject to EU equivalence compliance.

a company

Uruguay

Tanned sheepskins and garments.

No

Q13: The current Regulation already establishes the principle that countries that have concluded contractual preferential trade agreements with the EU (eg FTAs) should be removed from the GSP (it can be expected that a reciprocal FTA will incorporate and go beyond the autonomous preferences provided under GSP). . Should this principle be reinforced and made more operational? If so, how?

a business association

Argentina

Argentine Oil Industry Chamber

The EU should introduce a clause in all Free Trade Agreements with developing countries compromising "at least" the same preferences level as GSP scheme in the year 0 of the agreement tariff preference schedule. The GSP and a Free Trade Agreement should work as complementary tools for granting preferential market access to the EU and different policy choices to support developing countries exports.

a business association

Argentina

Argentine Biofuels Chamber

The EU should introduce a clause in all Free Trade Agreements with developing countries compromising “at least” the same preferences level as GSP scheme in the year 0 of the agreement tariff preference schedule. The GSP and a Free Trade Agreement should work as complementary tools for granting preferential market access to the EU and different policy choices to support developing countries exports.

a business association

Argentina

Rosario Board of Trade

The EU should introduce a clause in all Free Trade Agreements with developing countries compromising “at least” the same preferences level as GSP scheme in the year 0 of the agreement tariff preference schedule. The GSP and a Free Trade Agreement should work as complementary tools for granting preferential market access to the EU and different policy choices to support developing countries exports.

a business association

Argentina

Buenos Aires Grain Exchange

The EU should introduce a clause in all Free Trade Agreements with developing countries compromising “at least” the same preferences level as GSP scheme in the year 0 of the agreement tariff preference schedule. The GSP and a Free Trade Agreement should work as complementary tools for granting preferential market access to the EU and different policy choices to support developing countries exports.

a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

The EU should introduce a clause in all Free Trade Agreements with developing countries compromising “at least” the same preferences level as GSP scheme in the year 0 of the agreement tariff preference schedule. The GSP and a Free Trade Agreement should work as complementary tools for granting preferential market access to the EU and different policy choices to support developing countries exports.

a business association

Argentina

Bahia Blanca Grain Exchange

The EU should introduce a clause in all Free Trade Agreements with developing countries compromising “at least” the same preferences level as GSP scheme in the year 0 of the agreement tariff preference schedule. The GSP and a Free Trade Agreement should work as complementary tools for granting preferential market access to the EU and different policy choices to support developing countries exports.

a no profit organisation

Argentina

Export services

The EU should introduce a clause in all Free Trade Agreements with developing countries compromising “at least” the same preferences level as GSP scheme in the year 0 of the agreement tariff preference schedule. The GSP and a Free Trade Agreement should work as complementary tools for granting preferential market access to the EU and different policy choices to support developing countries exports.

a no profit organisation

Argentina

Research on international Negotiations

The EU should introduce a clause in all Free Trade Agreements with developing countries compromising “at least” the same preferences level as GSP scheme in the year 0 of the agreement tariff preference schedule. The GSP and a Free Trade Agreement should work as

complementary tools for granting preferential market access to the EU and different policy choices to support developing countries exports.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Tal nuestra respuesta a la pregunta 6, entendemos que no deberían surgir mayores inconvenientes al respecto dado que todos los acuerdos de libre comercio firmados por la UE con países beneficiarios del SGP buscarán profundizar las preferencias ya existentes. Atento a ello, estos acuerdos deberían incluir compromisos de reducción a partir del año de entrada en vigencia tomando como base los aranceles resultantes de régimen SGP. Aún así, y dado que la disposición prevista al respecto en el Reglamento (CE) N° 732/2008 es de carácter general, consideramos necesario que el nuevo régimen incorpore mayores especificaciones. Sobre todo debería contemplar qué sucede cuando el acuerdo comercial abarca las preferencias ya establecidas en el SGP pero no desde el año 0. En estos casos el reglamento debería prever que hasta tanto entre en vigencia la nueva preferencia negociada debe prevalecer la más conveniente para el país beneficiario.

a business association

Argentine

Argentine Soybean Chain Association

The EU should introduce a clause in all Free Trade Agreements with developing countries compromising “at least” the same preferences level as GSP scheme in the year 0 of the agreement tariff preference schedule. The GSP and a Free Trade Agreement should work as complementary tools for granting preferential market access to the EU and different policy choices to support developing countries exports.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Im Falle von bilateralen Präferenzen besteht dann keine Notwendigkeit der Beibehaltung von autonomen APS-Präferenzen, wenn diese zumindest gleichwertig und ohne zeitliche Lücke anwendbar sind.

a no profit organisation

Austria

trade policy

Many developing countries are now signing FTAs with the EU, meaning they are leaving the GSP and its incentive arrangements. While the Commission strives to ensure that FTAs include sustainable development chapters, such chapters often do not have the same monitoring and enforcement mechanisms as the GSP scheme. To ensure that the sustainable development and good governance objectives of GSP are maintained, the Commission should ensure that all new FTAs have sustainable development and good governance commitments and enforcement mechanisms that are no less favourable than those under the GSP. The new GSP regulation could contain a clause stating that GSP monitoring and enforcement provisions will continue to apply where an FTA affords weaker protection.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

FTA AND GSP HAS NOT DIRECT LINKAGES. WHILE GSP IS UNILATERALLY GIVEN BY EU , FTA IS BILATERAL. THERE MUST NOT BE CONFUSION IN THIS. GSP WILL BE A MUST BUT BILATERL FTA NEED NOT BE A MUST FOR THE DEVELOPING ETC NATIONS

a business association

Belgium

International trade in flowers

Yes, this principle should be reinforced and systematically applied, provided that the FTA fully incorporates at least the same preferential market access as under GSP and at least the same product coverage. It would help stabilise the market access for those developing countries that have concluded a FTA with the EU and would greatly simplify the situation for operators by avoiding confusion as to which trade regime is applicable. It would also make the market access situation more predictable for operators and investors in the long-term.

a business association

BELGIUM

NITROGEN FERTILIZERS

Yes it should be reinforced by simply removing the FTA partner from the GSP.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

Yes, this principle should be reinforced. See Q6.

a business association

Belgium

representation of interests of the EU food and drink industry

please see the answer to the question 6

a business association

Belgium

International trade

Yes, this principle should be reinforced and systematically applied, provided that the FTA fully incorporates at least the same preferential market access as under GSP and at least the same product coverage. It would help stabilise the market access for those developing countries that have concluded a FTA with the EU and would greatly simplify the situation for operators by avoiding confusion as to which trade regime is applicable. It would also make the market access situation more predictable for operators and investors in the long-term.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

This principle is of course very important. It does not make sense to cumulate the benefits.

a business association

Belgium

Wood products

The co-existence of multiple systems makes the understanding of the trade very difficult. Furthermore, the difficulties with free trade agreements is that, once granted, it is most difficult to take into account the economic and structural changes that occur since the FTA are granted. As an example one can mention Chile, which has seen a rapid expansion of its export-oriented wood-based panels production over the past years leading to a difficult trading situation on the EU market.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

GSP and FTAs can have a different product coverage and grant different preferential treatment. Therefore they can complement each other and should be able to co-exist. Article 3(2) of the current Regulation already deals with this to the extent that only if the FTA covers all GSP preferences, can GSP preferences be removed. There is no need to reinforce this principle as it would appear to work as it should (e.g., the removal of Chile and Moldova from the GSP after agreement of an FTA).

a business association

Belgium

Trade association: Man-made fibres

Yes, by legislation

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

Cf. reply to Q6 - Obviously the principle should be reinforced and made actually operational.

a business association

Belgium

Textiles & Clothing

As stated above the existence of an FTA implies in principle duty free access to the EU market and overall more favorable rules for our partners. The entry into force of an FTA should imply the termination of the GSP regime. An FTA has also obligations for both Partners and it is essential that we don't create a dubious situation which might hamper the fulfilment of these bilateral engagements.

a business association

Belgium

The CEFS (Comité Européen des Fabricants de Sucre) represents all European sugar manufacturers and refiners among the European Institutions (Council of Ministers, European Commission, European Parliament, Economic and Social Committee, etc.) and among different international organisations (FAO, WTO, etc.) - Since December 2009 CEFS is registered as interest representative (Identification number in the register: 49679062863-35).

A. This principle is logical and should be respected

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

If countries are removed from the GSP following the conclusion of a free trade agreement with the EU, the bilateral agreement in question needs to provide for predictability, legal certainty and stability at least to the same extent as the unilateral preferences. This goes also for any transitional periods. The tariff rate foreseen by the bilateral agreement should be lower than the one offered by the GSP.

a business association

Belgium

Representing the foreign trade interests of European retail trade

Countries that have free trade agreements with the EU should be removed from GSP, unless GSP advantages are higher.

a citizen

Belgium

Finance

No

a company

Belgium

Import of food items

See above

a no profit organisation

Belgium

Agricultural and Agrifood Trade

CELCAA supports the preservation of the current principle that countries having concluded FTAs with the EU should be removed from the GSP beneficiaries list, under the condition that the FTAs in question provide operators predictability, cover all products, and that the tariff rates foreseen in the FTAs are lower than the ones offered by the GSP.

a no profit organisation

Belgium

Economic justice

Under no circumstance should developing countries be pressured to sign a FTA only to maintain their access to the European market, while at the same time putting at risk their economic development because of market opening.

a no profit organisation

Belgium

trade union

The principle is already clear enough. However, many developing countries are now signing FTAs with the EU, meaning they are leaving the GSP and its incentive arrangements. While the Commission strives to ensure that FTAs include sustainable development chapters, such chapters often do not have the same monitoring and enforcement mechanisms as the GSP scheme. To ensure that the sustainable development and good governance objectives of GSP are maintained, the Commission should ensure that all new FTAs have sustainable development and good governance commitments and enforcement mechanisms that are no less favourable than those under the GSP. The new GSP regulation could contain a clause stating that GSP monitoring and enforcement provisions will continue to apply where an FTA affords weaker protection.

a no profit organisation

Belgium

trade

NO

a no profit organisation

Belgium

COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

COCERAL is in favour of the maintenance of the principle that countries which have concluded FTAs with the EU should be excluded from the GSP list, if the FTAs in question cover all products. This condition is necessary in order to make the principle operational and ensure the predictability operators need.

other

Belgium

Representing working people in all sectors throughout Europe ---- European Trade Union Confederation

The principle is already clear enough. However, many developing countries are now signing FTAs with the EU, thus leaving the GSP and its incentive arrangements. While the Commission strives to ensure that FTAs include sustainable development chapters, such chapters often do not have the same monitoring and enforcement mechanisms as the GSP scheme. To ensure that the sustainable development and good governance objectives of GSP are maintained, the Commission should ensure that all new FTAs have sustainable development and good governance commitments and enforcement mechanisms that are no less favourable than those under the GSP. The new GSP regulation could contain a clause stating that GSP monitoring and enforcement provisions will continue to apply where an FTA affords weaker protection.

other

Belgium

Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)

GSP and FTAs can have a different product coverage and grant different preferential treatment. Furthermore, the GSP interregional cumulation may not be possible within an FTA. Therefore, they can complement each other and should be able to co-exist as is already foreseen in Article 3(2) of the current Regulation that deals with coherence if the FTA covers all GSP preferences. There is no need to reinforce this principle, as it would appear to work as it should (e.g., with Chile and Moldova remaining as GSP beneficiary after an FTA).

other

Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)

The principle is already clear enough. However, many developing countries are now signing FTAs with the EU, thus leaving the GSP and its incentive arrangements. While the Commission strives to ensure that FTAs include sustainable development chapters, such chapters often do not have the same monitoring and enforcement mechanisms as the GSP scheme. To ensure that the sustainable development and good governance objectives of GSP are maintained, the Commission should ensure that all new FTAs have sustainable development and good governance commitments and enforcement mechanisms that are no less favourable than those under the GSP. The new GSP regulation could contain a clause stating that GSP monitoring and enforcement provisions will continue to apply where an FTA affords weaker protection.

other

Belgium

advising our members, interest representation ---- Cefic

Yes, this principle should be strictly applied. Countries, which are negotiating bilateral free trade agreements with the EU, must not additionally benefit from unilateral preferences. Generally, bilateral agreements are preferable to unilateral preferences, because they put trade relations between two countries on a contractual basis. Such free trade or economic partnership agreements are much appreciated alternatives to WTO. Unfortunately, it is noted that some negotiating partners of the EU see existing preferences as a matter of course and refuse to take reciprocal measures for contractually agreed tariff elimination. Here, the GSP adversely affects the EU's negotiating position. On the other hand, today the GSP fills some gaps which are left open by free trade agreements. Therefore, full inclusion of all products in free trade agreements needs to be ensured.

a no profit organisation

Belgium, Brussels

leather sector. COTANCE represents interests of National Associations of Tanners and Dressers

- This principle should be reinforced. See: Answer to Q6

a no profit organisation

Bolivia

Exportaciones

La base mínima de un acuerdo comercial no debería ser menor a las preferencias otorgadas en el SGP, por lo que si se firma otro acuerdo este prevalecería automáticamente sobre el SGP.

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

Not now

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

Las preferencias mínimas a considerar en un acuerdo comercial deben ser las otorgadas en el SGP, en caso de firmar un acuerdo prevalecería automáticamente sobre el esquema SGP.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

It's not necessary

a no profit organisation

Bolivia

industry

Considering that the start point for FTA negotiations should be the consolidation of trade preferences such as the GSP scheme, there should not be any troubles with that principle of exclusion.

other
BOLIVIA
EXPORTS ---- Government representative
Yes, because this will motivate other countries to have their own FTA.

other
Bolivia
Government ---- Government Official
This principle can be maintained on the basis that those countries will have negotiated the terms of their trade relations and will have covered tax preferences.

other
Bolivia
Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio
Consideramos que la base mínima de un acuerdo comercial no debería ser menor a las preferencias otorgadas en el SGP por lo que si se firma otro acuerdo este prevalecería automáticamente ante el SGP.

a business association
Brazil
industrial sector
No, the principle should not be reinforced. The current, once the Article 3.2 already states that countries which have concluded preferential trade agreements with the EU should be removed from the GSP.

other
Brazil
Government ---- Ministry of External Relations - Federative Republic of Brazil
As referred to in Q6, we agree that a reciprocal FTA should go beyond the autonomous preferences provided under GSP and liberalization schemes should depart from GSP levels.

a company
Cambodia
Export
No It should not.

other
Colombia
Tourism and Trade (Import-Export) ---- Government of Colombia
Generally speaking, free trade treaties are deeper than the GSP. However, there might be the case of a product or group of products for which access under the respective FTA is equal to or a bit more restrictive than in the GSP. For this reason, we should not strengthen the principle that the GSP is deleted when you sign up and apply a trade agreement with the EU. The principle that the GSP applies until it is fully reached by the trade agreement must be maintained.

a business association
Ecuador
Ecuadorian Exportes Federation
El Artículo 3 del Reglamento 732/2008 es cláusula es de aplicación automática por lo que no sería necesario reforzarla o hacerla más operacional. Lo que se debe mantener es la posibilidad de acumular origen entre los beneficiarios del SGP y aquellos que abandonan el SGP por acuerdos comerciales bilaterales.

other
Ecuador
Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador
Article 3 of Regulation 732/2008 clearly establishes the conditions when a beneficiary country benefits from a preferential trade agreement, should be removed from the GSP. It is understood

that such clause is of automatic application, and, therefore, it would be unnecessary to reinforce it or make it more operational.

a business association

Finland

Trade Policy

The current principle should be reinforced by appropriate measures.

a company

Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.

Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products

Yes, it should be reinforced.

a business association

France

MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies

this principle must be reinforced and made more operational.

a business association

France

Textile

Yes this principle should be reinforced in order to enlarge the opportunities between the partners.

a business association

Germany

Industry

Yes, this principle should be strictly applied. Countries, which are negotiating bilateral free trade agreements with the EU, must not additionally benefit from unilateral preferences. Generally, bilateral agreements are preferable to unilateral preferences, because they put trade relations between two countries on a contractual basis. Such free trade or economic partnership agreements are much appreciated alternatives to WTO.

Unfortunately, it is noted that some negotiating partners of the EU see existing preferences as a matter of course and refuse to take reciprocal measures for contractually agreed tariff elimination. Here, the GSP adversely affects the EU's negotiating position. On the other hand, today the GSP fills some gaps which are left open by free trade agreements. Therefore, full inclusion of all products in free trade agreements needs to be ensured.

a company

Germany

chemical sector

This principle should be applied very strictly. Countries, which are negotiating bilateral free trade agreements with the EU, should not benefit from unilateral preferences on top of the negotiated preferences in the context of bilateral free trade agreements. Generally, bilateral agreements are preferable to unilateral preferences, because they put trade relations between two countries on a contractual basis and in a broader context.

Such free trade or economic partnership agreements are much appreciated alternatives to WTO agreements. Unfortunately, today some negotiating partners of the EU take existing preferences for granted and refuse to take reciprocal measures for further contractually agreed tariff eliminations (DDA). The GSP system therefore adversely affects the EU's negotiating position.

On the other hand, today the GSP mechanism fills some gaps which are left open by free trade agreements. Therefore, full inclusion of all products in free trade agreements needs to be ensured.

a company

Germany

Think-tank for European and international economy and governance
well, if the FTA really would work!

a company
Germany

We consider that a country should continue benefiting from GSP during the tariff dismantling period provided for in the FTA. GSP preferences should also be granted to those products excluded from the FTA. Different rules of origin under GSP and the FTA (threshold of local content) might also lead to the fact that GSP preferences are more advantageous for the country in question. In these cases GSP should be maintained.

other
Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

Yes, this principle should be strictly applied. Countries, which are negotiating bilateral free trade agreements with the EU, must not additionally benefit from unilateral preferences. Generally, bilateral agreements are preferable to unilateral preferences, because they put trade relations between two countries on a contractual basis.

Such free trade or economic partnership agreements are much appreciated alternatives to WTO. Unfortunately, it is noted that some negotiating partners of the EU see existing preferences as a matter of course and refuse to take reciprocal measures for contractually agreed tariff elimination.

Here, the GSP adversely affects the EU's negotiating position. On the other hand, today the GSP fills some gaps which are left open by free trade agreements. Therefore, full inclusion of all products in free trade agreements needs to be ensured.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

Please see question Q6.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

Please see question Q6.

a no profit organisation
India

Research in International Economic Relations

The principle established by the current Regulation is fine. However, there should not be any abrupt change and the gradual phase out of the GSP benefit should proceed in parallel with the phasing in of the benefits of the new contractual preferential trade arrangement.

other
Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

I do not think this principle should be enforced in general. I think it is wrong at the light of differentiation of objectives that should be pursued see Q3.

other
Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

A list of GSP beneficiaries in the next regulation should not include countries, which have signed the free trade agreements with the EU (concluded or applied temporarily pending their

conclusion). The next GSP should establish an as swift as possible procedure for removal from the list of beneficiaries countries which have signed FTA with the EU during the validity of the regulation.

a company
Malaysia
Screw, Nut & Washer
No. Different to re-adjust.

a company
Malaysia
Manufacturer of furniture
No comment.

a company
Malaysia
Manufacturing
We should have either one. Having GSP and FTA with EU at the same time created confusion to the exporters. We should evaluate which is the best, either GSP or FTA.

a company
Malaysia
Manufacturer
No

other
Malaysia
International trade and industry ---- Ministry of International Trade and Industry Malaysia
The principle of having GSP preference and contractual preferential trade agreement simultaneously could be considered to beneficiary countries.

other
Mauritius
International Trade ---- Government official
Big emerging economies should be excluded as they represent major competitors to other GSP beneficiaries.

a citizen
Myanmar
observer
that countries is still low developed country, it should be provided GSP

a company
Myanmar
Information Supply
Yes.

other
Panamá
Servicio ---- Ministerio de Comercio e Industria de Panamá
En virtud de que Panamá y Centroamérica han negociado acuerdos comerciales con la Unión Europea, se entiende con fundamento en el actual reglamento, que una vez entrado en vigencia dicho acuerdo nuestro país será removido del SGP. En base a este principio, consideramos que debe hacerse más operacional, es decir, los beneficios adquiridos bajo el régimen de SGP deberían cesar su vigencia en el momento de la entrada en vigencia del otro acuerdo comercial, siempre que tal acuerdo comercial incluya como mínimo todas las preferencias que se le otorgan a Panamá a través del SGP actual.

a company
Qatar

Liquified Natural Gas
No comment.

a business association
Spain
Fisheries
It would depend on the financial contributions to be obtained.

a business association
Sweden
Representing the Swedish textile-, garment-, and shoe import trade
Q 13. Yes.

other
Switzerland
Policy research and negotiation assistance ---- International organization
See Q6

other
Thailand
Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce
No. Thailand considers that both the GSP and FTA can harmoniously co-exist since they both share the same goal of trade liberalization - provided that the import tariffs under the FTA be reduced to zero or be equally low as those reduced tariffs under the GSP scheme.

a citizen
UK
Economic research
If the FTA gives all existing preferences (or goes beyond them), there is no reason to remove GSP preferences (if countries use them, they get the same access, so aside from a little inconvenience for customs officers what is the difference?). The best test of whether an FTA genuinely does this is to leave the GSP preferences in place for a period, and see if anyone uses them. Existing exporters may for a while, because of familiarity, but goods change so rapidly that this is unlikely to require a long transition. There are many more important things to worry about than some out-of-date documents.

a company
UK
Import and Distribution
yes - not sure how

a no profit organisation
UK
Development Education, campaigns + advocacy
To restate, any trading arrangement adopted must maximize benefit for the least advantaged partner. Although 'it can be expected that' a reciprocal FTA will go beyond GSP, such an FTA should not close off GSP treatment unless it can be demonstrated that the FTA arrangements produce more benefit for the less well off partner.
In short, GSP treatment should remain available to the DC even if an FTA has been signed. DCs, however, should be exempt from obligations of reciprocity. The EBA status of LDCs should be secure; no bilateral or other trade agreement should be able to impose further obligations on LDCs regarding opening their markets.

other
UK
Multi sector trade union - public services, manufacturing and commercial services ---- trade union
The principle is already clear enough. However, many developing countries are now signing FTAs with the EU, meaning they are leaving the GSP and its incentive arrangements.

GMB wishes to see the EU Commission put more emphasis on the inclusion of sustainable development and good governance chapters in all FTAs, and other trade agreements with EU, with a clear focus on human rights, labour standards and social considerations.

GMB has concerns that currently such chapters often do not even have the same level of monitoring and enforcement mechanisms as the GSP scheme, which as we highlight in our response are not strong enough, and urges that these are strengthened and made more effective by going beyond those under the GSP.

As a safeguard, the new GSP regulation should contain a clause stating that GSP monitoring and enforcement provisions will continue to apply where an FTA affords weaker protection.

As many countries begin to move to new forms of wider trade agreements, GMB notes the increase in commitments by the EU Commission under Mode 4 provisions in the General Agreement on Trade in Services (GATS) giving access for the temporary movement of workers from outside the EU, and allowing transnational corporations to bring their own service supply workers into the EU. These offers are included in all EU trade agreements currently under negotiation including FTA's, EPA's and at the WTO.

Some countries such as India are pursuing this issue aggressively in the negotiations. GMB and our international trade union colleagues have concerns that these offers may have a negative impact in undermining working conditions, collective agreements, employment rights and labour standards in the EU if they are not made conditional on respect for these principles. Currently we do not see evidence that the EU Commission is incorporating such conditions into these offers. Without such conditions, there are risks of undercutting and social dumping, encouraging unfair competition on the back of exploitation of workers globally, and compromising the development of sustainable social, economic and environmental development, which we thought was a core principle driving EU trade policy.

GMB urges the EU Commission to be fully transparent with the terms of Mode 4 offers under negotiation, and to initiate full labour and human rights impact assessments in this area for individual Member States as part of all the current negotiations, and for countries moving from GSP agreements to other EU trade agreements in the future.

a business association
United Kingdom
Seafood importation
No comment

a no profit organisation
United Kingdom
animal welfare
Yes providing the FTA does provide beyond the autonomous preferences provided for all sectors

a no profit organisation
United Kingdom
Representing workers in all sectors in the UK
The principle is already clear enough. However, many developing countries are now signing FTAs with the EU, thus leaving the GSP and its incentive arrangements. While the Commission strives to ensure that FTAs include sustainable development chapters, such chapters often do not have the same monitoring and enforcement mechanisms as the GSP scheme. To ensure that the sustainable development and good governance objectives of GSP are maintained, the Commission should ensure that all new FTAs have sustainable development and good governance commitments and enforcement mechanisms that are no less favourable than those under the GSP. The new GSP regulation could contain a clause stating that GSP monitoring and enforcement provisions will continue to apply where an FTA affords weaker protection.

Q14: The current Regulation includes a wide range of beneficiaries, including countries that have become major global actors in international trade with very significant and wide-ranging exports to the EU and participation in global markets (eg the emerging economies such as Brazil, China and India). Should GSP continue to be available to such major traders (albeit with

their individual benefits under the scheme effectively modulated as a result of the graduation mechanism) or should they be excluded altogether on the grounds that they no longer need preferential access under GSP to support their effective participation in EU markets or their broader development? If the latter, then what general, horizontal indicators should be considered as relevant to determine continued participation in the scheme?

a business association

Argentina

Argentine Oil Industry Chamber

Yes, GSP should be granted to all developing and less developed countries following GATT Enabling Clause. Mostly considering the fact that countries development assessment indicators must reflect the whole country circumstances not the particularities of any domestic industry. Argentina should be considered as a developing country according to different and agreed international parameters related to economic and social development. The application of EU GSP scheme has developed positive outcomes in different agrifood and energies value chains, creating new employments, improving rural livelihood and new processing practices. Argentina farmers and industries would suffer tremendous impacts if the EU excludes products or sectors from the GSP scheme, generating negative social impacts.

a business association

Argentina

Argentine Biofuels Chamber

Yes, GSP should be granted to all developing and less developed countries following GATT Enabling Clause. Mostly considering the fact that countries development assessment indicators must reflect the whole country circumstances not the particularities of any domestic industry. Argentina should be considered as a developing country according to different and agreed international parameters related to economic and social development. The application of EU GSP scheme has developed positive outcomes in different agrifood and energies value chains, creating new employments, improving rural livelihood and new processing practices. Argentina farmers and industries would suffer tremendous impacts if the EU excludes products or sectors from the GSP scheme, generating negative social impacts.

a business association

Argentina

Rosario Board of Trade

Yes, GSP should be granted to all developing and less developed countries following GATT Enabling Clause. Mostly considering the fact that countries development assessment indicators must reflect the whole country circumstances not the particularities of any domestic industry. Argentina should be considered as a developing country according to different and agreed international parameters related to economic and social development. The application of EU GSP scheme has developed positive outcomes in different agrifood and energies value chains, creating new employments, improving rural livelihood and new processing practices. Argentina farmers and industries would suffer tremendous impacts if the EU excludes products or sectors from the GSP scheme, generating negative social impacts.

a business association

Argentina

Buenos Aires Grain Exchange

Yes, GSP should be granted to all developing and less developed countries following GATT Enabling Clause. Mostly considering the fact that countries development assessment indicators must reflect the whole country circumstances not the particularities of any domestic industry. Argentina should be considered as a developing country according to different and agreed international parameters related to economic and social development. The application of EU GSP scheme has developed positive outcomes in different agrifood and energies value chains, creating new employments, improving rural livelihood and new processing practices. Argentina farmers and industries would suffer tremendous impacts if the EU excludes products or sectors from the GSP scheme, generating negative social impacts.

a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

Yes, GSP should be granted to all developing and less developed countries following GATT Enabling Clause. Mostly considering the fact that countries development assessment indicators must reflect the whole country circumstances not the particularities of any domestic industry. Argentina should be considered as a developing country according to different and agreed international parameters related to economic and social development. The application of EU GSP scheme has developed positive outcomes in different agrifood and energies value chains, creating new employments, improving rural livelihood and new processing practices. Argentina farmers and industries would suffer tremendous impacts if the EU excludes products or sectors from the GSP scheme, generating negative social impacts.

a business association

Argentina

Bahia Blanca Grain Exchange

Yes, GSP should be granted to all developing and less developed countries following GATT Enabling Clause. Mostly considering the fact that countries development assessment indicators must reflect the whole country circumstances not the particularities of any domestic industry. Argentina should be considered as a developing country according to different and agreed international parameters related to economic and social development. The application of EU GSP scheme has developed positive outcomes in different agrifood and energies value chains, creating new employments, improving rural livelihood and new processing practices. Argentina farmers and industries would suffer tremendous impacts if the EU excludes products or sectors from the GSP scheme, generating negative social impacts.

a no profit organisation

Argentina

Export services

GSP should be granted to all developing and less developed countries following GATT Enabling Clause. Mostly considering the fact that countries development assessment indicators must reflect the whole country circumstances not the particularities of any domestic industry. In the case of Argentina it should be considered as a developing country according to different and agreed international parameters related to economic and social development. The application of EU GSP scheme has developed positive outcomes in different agrifood and energies and other industrial value chains, creating new employments and facilities, improving rural livelihood and new processing practices. Argentina farmers and industries would suffer tremendous impacts if the EU excludes products or sectors from the GSP scheme, generating negative social impacts.

a no profit organisation

Argentina

Research on international Negotiations

Yes, GSP should be granted to all developing and less developed countries following GATT Enabling Clause. Mostly considering the fact that countries development assessment indicators must reflect the whole country circumstances not the particularities of any domestic industry. Argentina should be considered as a developing country according to different and agreed international parameters related to economic and social development. The application of EU GSP scheme has developed positive outcomes in different agrifood and energies value chains, creating new employments, improving rural livelihood and new processing practices. Argentina farmers and industries would suffer tremendous impacts if the EU excludes products or sectors from the GSP scheme, generating negative social impacts.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Los países beneficiarios del SGP deberían continuar siendo, tal lo previsto en la cláusula de habilitación, todos los PED. En caso de considerar nuevos indicadores de desarrollo, entendemos sumamente importante que cada país sea evaluado como un todo teniendo en cuenta aspectos tanto económicos como sociales (Por ejemplo, la importancia de las preferencias arancelarias para las economías regionales). Asimismo consideramos necesario que se adopten parámetros desarrollados por organismos reconocidos internacionalmente.

a business association

Argentina

Argentine Soybean Chain Association

Yes, GSP should be granted to all developing and less developed countries following GATT Enabling Clause. Mostly considering the fact that countries development assessment indicators must reflect the whole country circumstances not the particularities of any domestic industry. Argentina should be considered as a developing country according to different and agreed international parameters related to economic and social development. The application of EU GSP scheme has developed positive outcomes in different agrifood and energies value chains, creating new employments, improving rural livelihood and new processing practices. Argentina farmers and industries would suffer tremendous impacts if the EU excludes products or sectors from the GSP scheme, generating negative social impacts.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Diese Länder sollten nicht mehr in den Genuss der APS-Präferenzen kommen, da sie keine diesbezügliche Unterstützung mehr benötigen. Es sind vielmehr die weniger entwickelten Länder dadurch zu fördern, dass gerade sie - im Gegensatz zu den bereits ausreichend wettbewerbsfähigen Schwellenländern - in den Genuss der Begünstigungen kommen . Voraussetzung ist wiederum, dass objektive Kriterien vorliegen.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

GSP IS PRIMARILY FOR PEOPLE WHO NEEDS SUPPORT. INCOME LEVEL PROVES IT. BY EXTENDING IT TO ANY COUNTRY WHO ARE ALREADY ENJOYING A GOOD INDUSTRIAL AND ECONOMIC POSITION CANNOT BE ELIGIBLE. HOWEVER, NO INTERNATIONAL POLITICS SHOULD COME TO SUCH A DECISION

a business association

Belgium

Cocoa sector

We see no reason to remove emerging and transitional economies from the GSP countries beneficiary list. In order to exclude these countries from the beneficiary list additional criteria should be introduced to the existing ones in the Regulation which could make current system more complicated.

a business association

Belgium

International trade in flowers

Union Fleurs believes that a country's size, its export volumes or its share in total GSP-covered imports should not per se hinder its acceptance as GSP beneficiary. The only credible and coherent solution is the application of objective development criteria. Should an assessment on these grounds come to the result that a given country meets the criteria, this country should be entitled to GSP preferences.

a business association

Belgium

Renewable energies

Argentina is the third largest soybean producer with 18% of the world production and also the third soybean oil processor with 18% of global production, but ranks as the first exporter (45% of the global export market for soybean oil) because 90% of its production is exported . 80% of the Argentine soybean is grown in the Santa Fe region, which is close to the Rosario and San Lorenzo port facilities - the export gates to the EU and the US. Biodiesel plants are located along the river Parana, ensuring easy logistics.

Currency devaluation, biotechnology use, improved agricultural management and the differential export taxes have contributed to the development of the Argentine biodiesel. "In

just under four years Argentina has made an astonishing catch-up with some of the more mature biodiesel producers such as Germany”, one of the EU Member States most affected by B99 imports over the last few years, “and the prospects for the sector have never been brighter” . In the view of EBB, there is no ground for further extending the GSP coverage of the fastest-growing biodiesel industry in the world, which has become the main exporter to the EU. Similarly, Indonesia and Malaysia produce 80% to 85% of the world’s palm oil and their exports represent 90% of the global trade, because 70% of their production is exported. The size and maturity of their palm oil sector has justified their graduation from the GSP for section III for ‘Animal and vegetable fats and oils’.

The difference between crude rapeseed oil and crude palm oil in Rotterdam shows a 14% price advantage for palm oil, amounting to 18.5% when adding the Indonesian export tax for palm oil. This price advantage compares with the artificial 18% price advantage created by the Argentine differential export taxes.

According to biodiesel prices in Rotterdam, biodiesel made from Argentine soybean oil (SME) is cheaper by some 50 USD/metric ton than European-made biodiesel based on rapeseed oil (RME), with a difference peaking at 100 USD/metric ton during the summer 2009. When it comes to Indonesian or Malaysian palm oil biodiesel (PME), the price difference reaches 100 USD/metric ton and 200 USD/metric from August to mid-September 2009. A 100 USD/metric ton and 200 USD/metric respectively equal 10% and 20% of the price for biodiesel produced from rapeseed oil in the EU, accounting for a large competitive advantage in favour of the Malaysian and Indonesian producers.

In conclusion, GSP tariff preferences support the main biodiesel exporters to the EU, which are perfectly mature and competitive on the EU market due to a price advantage on feedstock, reflected in the biodiesel price, ranging from 14% to 18%. Against this background, it is difficult to justify continued GSP tariff preferences artificially adding to the competitive advantage of Argentina, Indonesia and Malaysia, when the EU industry has not been given the chance to recover from the unfair competition from the subsidized and dumped US biodiesel.

The graphs and references for the data presented here can be found in the EBB position ref. 472/TRA/10 sent to TRADE-GSP-Consultation@ec.europa.eu last June 2nd, 2010.

a business association

BELGIUM

NITROGEN FERTILIZERS

The BRICs - or other fast emerging economies do not need GSP benefits. Gsp should be removed.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

It is important to focus the GSP on the countries that need it most. For this reason, high income countries should be excluded from the GSP. Also, graduation should be calculated on the basis of a country’s total exports, instead of GSP covered exports only. This change would provide a more accurate view of the competitiveness of the economy than using GSP exports alone.

a business association

Belgium

International trade

FRUCOM believes that a country’s size, its export volumes or its share in total GSP-covered imports should not per se hinder its acceptance as GSP beneficiary. The only credible and coherent solution is the application of objective development criteria. Should an assessment on these grounds come to the result that a given country meets the criteria, this country should be entitled to GSP preferences.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

We believe that these major partners should no longer be eligible under the GSP scheme. Furthermore, these partners are in most cases responsible for unfair pricing policies which disrupt the markets. Giving them a preference is a way to contribute to this pricing unbalance (and unfair practice).

a business association

Belgium

Wood products

The wood sector suffers strongly from imports from emerging companies like Brazil and China, who have developed into major exporters and world market player. For our sector these countries cannot be considered being underdeveloped, on the contrary. Extra-EU imports of plywood for example accounted in 2009 for the first time more than half EU consumption.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

The size of an emerging economy does not necessarily mean that it no longer needs the benefits of GSP on a sectoral basis. GSP preferences should continue to be afforded given the differences in economic development of these countries whether geographically or depending on sectors of industry. Sector graduation exists. Article 3.1 of the existing GSP Regulation permits the removal of a country from the GSP scheme if (i) it has been classified by the World Bank as a high income country during three consecutive years and (ii) if the value of imports for the five largest sections of its imports covered by the GSP represent less than 75% of the total GSP covered imports of that country. These criteria can continue to apply. If ultimately these countries are to be removed as a GSP beneficiary, it should only be done after an FTA has already been concluded.

a business association

Belgium

Trade association: Man-made fibres

Emerging countries should be excluded from GSP

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

What matters, in fact, is the efficiency with which the system serves its actual purpose. In this respect, the re-assessment of the list of beneficiary countries should take into consideration - the actual industrial weight of beneficiary countries in the various sectors, in terms of both their respective share of global production and global trade but also their positioning in relation to EU production and trade, - the policies operated by beneficiary countries domestically and on export, which are having a systemic and distorting impact on global competition, - the competitive pressure that recourse to the GSP by beneficiary countries imposes on EU markets. E.g. it is not acceptable to grant market access preferences to a country which secures competitive advantages on export to its domestic producers by implementing, through various means, dual pricing on raw materials, or by subsidizing access to raw materials, be they domestic or imported.

a business association

Belgium

Textiles & Clothing

Most of these countries are in fact excluded under the Graduation Mechanism. However it is clear that some of these countries are emerging economic and trade powers and there is no reason for them to benefit from GSP especially in sectors where they are already well developed and highly competitive as T&C. The continuation in the scheme should be liaised with the need for economic diversification and benefit only upcoming industries or business sectors.

a business association

Belgium

To defend the interests of the EU aluminium transformers and consumers in the domains of EU policy of relevance for the sector

Exclude from GSP the emerging countries that in many cases give the domestic productions competitive advantages. For aluminium semi fabricated and finished products, it appears a

strong loss of competitiveness power of the EU industry granting a GSP status or the more beneficial conditions of EFTA and LOME to countries which have a modern manufacturing capability and that can purchase their primary aluminium feedstock without tariffs, for this having a lower cost of sales in the EU than an EU semi fabricators. Countries such as Norway, Switzerland, Russia, GCC and many others have this advantage (because primary aluminium can represent 75% of the cost of the semi fabricated product) which can only be corrected by suspending the tariff on primary aluminium alloyed and unalloyed products.

a business association

Belgium

EUROCHAMBRES, the Brussels-based Association of European Chambers of Commerce and Industry EUROCHAMBRES is the sole European body that serves the interests of every sector and every size of European business and the only one so close to business. EUROCHAMBRES has member organizations in 45 countries representing a network of 1,700 regional and local Chambers with over 19.8 million member companies. Chamber members employ over 120 million employees.

See the response to question 11 - objective development criteria should determine which countries qualify.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

As stated above, a country's size, its export volumes or its share in total GSP-covered imports should not per se hinder its acceptance as GSP beneficiary. The only credible and coherent solution is the application of objective development criteria. Should an assessment on these grounds come to the result the specific country meets the criteria, the country should be entitled to GSP preferences.

a business association

Belgium

Representing the foreign trade interests of European retail trade

GSP should also continue to be available to major traders. The graduation mechanism will help to remove sectors from GSP.

a company

Belgium

Import of food items

If the EU really and in a practical and efficient way wants to help the developing and poor countries, logically BRIC countries have to be excluded from the so-called benefits of GSP....This system mainly contributes to enrich unjustifiedly mainly monopolistic multinational companies, already operating in full swing in Brazil and in India, and to a certain extent also in China with the sole purpose to maximize their own profits and to create an even bigger capital- and money drain out of the producing countries

a no profit organisation

Belgium

Development NGO

Given the large inequalities in these countries, they should continue to enjoy GSP benefits depending on the number of poor in the country and for products on the export of which large numbers of poor people depend or that could create incomes for them

a no profit organisation

Belgium

Agricultural and Agrifood Trade

No comment.

a no profit organisation

Belgium

trade

They should be excluded if they have achieved a higher economic development.

a no profit organisation

Belgium

COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

The EU is not self sufficient for a series of raw materials. In order to ensure competitiveness and a sufficient supply of raw materials COCERAL strongly supports the maintenance of emerging economies in the GSP scheme. A level playing field should be ensured for local production as well as for imports, which should not be obstructed by additional requirements to the current system.

other

Belgium

Representing working people in all sectors throughout Europe ---- European Trade Union Confederation

It is clear that emerging economies need to be considered on a case by case basis and at a sectoral level. If some of these countries are allowed to remain in the scheme then expectations of them in meeting the criteria must be strengthened considerably. A possible ratcheting up scale requiring them to go beyond basic effective implementation on the conventions might be worth considering. The current situation in China, for instance, in relation to effective implementation of the conventions on trade union rights and freedoms and the right to organise and bargain collectively clearly do not meet the existing criteria. The EU should expect major improvement in all areas of the conventions listed as these economies have grown in order to continue to qualify, no major global actor should continue to benefit from preferential schemes whilst refusing to move from first base on the listed conventions.

other

Belgium

Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)

GSP preferences should continue to be allowed given the differences in economic development within the countries, whether geographically or depending on sectors of industry. Sector graduation already exists to take account of this fact and is in fact an important distinction which must remain in place. Article 3.1 of the GSP Regulation (EC) No 732/2008 permits the removal of a country from the GSP scheme if (i) it has been classified by the World Bank as a high income country during three consecutive years and (ii) if the value of imports for the five largest sections of its imports covered by the GSP represent less than 75% of the total GSP covered imports of that country. These criteria could continue to apply. If ultimately these countries would be removed as a GSP beneficiary, an FTA should be concluded with them to ensure continued mutually beneficial trade relations.

other

Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)

It is clear that emerging economies need to be considered on a case by case basis and at a sectoral level. If some of these countries are allowed to remain in the scheme then expectations of them in meeting the criteria must be strengthened considerably. A possible ratcheting up scale requiring them to go beyond basic effective implementation on the conventions might be worth considering. The current situation in China, for instance, in relation to effective implementation of the conventions on trade union rights and freedoms and the right to organise and bargain collectively clearly do not meet the existing criteria. The EU should expect major improvement in all areas of the conventions listed as these economies have grown in order to continue to qualify, no major global actor should continue to benefit from preferential schemes whilst refusing to move from first base on the listed conventions.

other

Belgium

advising our members, interest representation ---- Cefic

From our viewpoint, the GSP should be abolished for high-income countries and also for emerging economies. In the manufacture of many products, the above-mentioned emerging economies are globally competitive enough not to need tariff preferences.

a no profit organisation

Belgium, Brussels

leather sector. COTANCE represents interests of National Associations of Tanners and Dressers

Emerging economies benefiting from GSP reduce the GSP benefits of their less developed counterparts. The exclusion of countries should not be total but only for products where they occupy a dominant position, in the scheme and in the market.

a no profit organisation

Bolivia

Exportaciones

Los criterios de selección de países podrían ser modificados, respetando el acceso de países como Bolivia, de menor desarrollo económico relativo.

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

Countries like Brazil, China and India should be excluded from the GSP since they have achieved a higher economic level than the rest and therefore are highly productive and competitive, creating a very strong competition for the least developed countries.

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

Los países de selección deberían cambiar considerando dando prioridad para ser beneficiario del esquema SGP a los países en vías de desarrollo.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

Those countries (Brazil, China and India) should be excluded from the GSP since they have achieved a higher economic level than the rest and therefore are highly productive and competitive, creating a very strong competition for the least developed countries

a no profit organisation

Bolivia

industry

They should be excluded form the scheme since they are competitive enough to access the international markets not only the European one but others

other

BOLIVIA

EXPORTS ---- Government representative

No, because this would decrease the opportunities for poor countries.

other

Bolivia

Government ---- Government Official

There is no need to exclude them.

other

Bolivia

Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio

Consideramos que los criterios de selección de países beneficiarios podrían cambiar respetando el acceso de países como Bolivia de menor desarrollo económico relativo.

a business association

Brazil

industrial sector

The main objective of the GSP is to reduce poverty by fostering trade and development in low income countries. However, a country's size is by no means a proper indicator of development. Considering this, graduation should still be based on World Bank's transparent and internationally recognized income criteria.

other

Brazil

Government ---- Ministry of External Relations - Federative Republic of Brazil

Given the objective of EU GSP scheme to provide support for the sustainable development of developing countries, it is paramount that the selection criteria for beneficiary countries are based in economic and development indicators. In the particular case of Brazil, despite increasing its trade and development conditions, Brazil is still a developing country when development indicators are considered, as assessed by many international organizations. The heterogeneity of the Brazilian economy implies that, while certain industries and regions are well developed, other industries and regions still need GSP preferences to be able to maintain their access to the international market and benefit their exporting regions development.

a business association

Brussels

steelmaking

In principle, they should be excluded altogether on the grounds that they no longer need preferential access under GSP to support their effective participation in EU markets or their broader development. From a European steel perspective, for those ferro-alloys exporters which have become major global actors in international steel trade, there is no need for consideration of general, horizontal indicators to determine continued participation in the scheme.

a company

Cambodia

Export

No it should not.

other

Colombia

Tourism and Trade (Import-Export) ---- Government of Colombia

The mechanisms established in Regulation 732 in 2008 relating to vulnerability or the outstanding points drawn by the World Bank in article 3, which refers to high incomes for three consecutive years and the value of the five most significant sections of the imports of that country in the Community within the framework of the GSP, representing less than 75% of total imports of this country in the Community within the framework of the GSP; are consistent in Colombia's opinion.

a business association

Ecuador

Ecuadorian Exportes Federation

Como se señaló en la respuesta a la pregunta 11 el SGP debe mantenerse para los países que más lo necesitan y les es complejo ingresar al mercado europeo solamente con las condiciones de arancel de nación más favorecida.

a business association

Ecuador

Tuna Industry

Those countries should be excluded.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

The GSP should not be available to emerging economies as they normally have the necessary productivity and competitiveness so as to access the European market with most favored nation duties.

a business association

Finland

Trade Policy

The situation should be carefully studied and no changes should be made without a common understanding of a new regime.

a business association

Finland

Pulp, paper, paperboard and wood products industries interest representation

The above mentioned major global actors in international trade PLUS Russia should be put outside the GSP or at least one should terminate their rights to use the GSP-scheme. Please, see our answer to question no. 10.

a company

Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.

Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products

EU should pay more attention to asymmetry between the EU's import tariffs and the tariffs EU industries are facing in other countries, such as the fast growing economies that are building their industries behind a high tariff barrier.

a business association

France

MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies

The GSP objective is to help Developing countries to improve their export flows thanks to easier access to European market. Competitive export countries should not need preferential tariffs because their manufactured products are enough competitive and performing. These countries are: developed countries, high income countries and the so-called "Emerging countries". Unfortunately, there is no multilateral recognized definition for such countries and WTO rules don't recognize the principle of differentiation advocated by EU within the DDA negotiations. While waiting for a new international and objective categorization, EU should maintain its binding and WTO-compatible mechanism of graduation to preserve its preferential access to countries that effectively need them.

a business association

France

Textile

In our sector most of these countries are excluded.

a business association

Germany

Industry

From our viewpoint, the GSP should be abolished for high-income countries and also for emerging economies. In the manufacture of many products, the above-mentioned emerging economies are globally competitive enough not to need tariff preferences.

a company

GERMANY

PHARMA/CHEMICALS

From our point of view, the high-income countries as well as the emerging economies should be excluded from the GSP. In the manufacture of many products, the above-mentioned are globally competitive and, therefore, the tariff preferences are not justified.

a company

Germany
chemical sector

Over the years, the above mentioned major traders and emerging countries, such as China and India, have evolved into worthy and highly-competitive players for many chemical products. It is therefore questionable to grant additional tariff preferences to such highly competitive players in the chemical sector.

a company
Germany
Think-tank for European and international economy and governance
sorry, too complex to be replied now in this short time

a company
Germany
GSP should continue to be available to emerging markets and transition economies. However with regard to graduation, a thorough sector analysis has to be undertaken to assess the real competitiveness of the individual sector. (see also answer to graduation mechanism). A country should be excluded from GSP if it reaches a certain level of competitiveness. The exclusion however should be done sector-specific.

a company
germany
chemical production
The preferences shall be linked to fair working conditions for the workers in developing countries comparable to those in the EU, esp. for occupational health, safety and environmental protection. I would rather stop paying subsidies to china in form of developmental aid.

a company
Germany
production of fine chemicals on request - toll manufacturer for fine chemicals
see Q3 and Q3 for reference. China does violate by any means industrial standards, also of environmental protection and supports exports financially. The last big environmental scandal came all out of China, indicating that the ethics are not developed to a level acceptable. This leads to a misbalance between those countries.

other
Germany
advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers
From our viewpoint, the GSP should be abolished for high-income countries and also for emerging economies. In the manufacture of many products, the above-mentioned emerging economies are globally competitive enough not to need tariff preferences.

a business association
In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...
Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).
The GSP scheme has to be essentially "generalized, non-reciprocal and non-discriminatory". Also, this regime should assist these countries to attain a level of competitiveness which could make them self-supporting economically and full partners in international trade. Once this level is reached and these countries could not be already beneficiaries of the preferences under the GSP scheme, it is necessary to articulate transitional measures to alleviate the possible negative effects coming from the withdrawal of the preferences.
Furthermore, impact assessment should be made to analyze the possible consequences of the withdrawal of the preferences on the beneficiary countries. In the case of emerging countries, it has to be analyzed if they are needed of GSP preferences, if not, via graduation system, those preferences for those sectors where these countries are strongly competitive would be

gradually withdrawn. However, they should be excluded if they do not obey to human rights, labour, environment, and governance minimum standards.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

The GSP scheme has to be essentially "generalized, non-reciprocal and non-discriminatory". Also, this regime should assist these countries to attain a level of competitiveness which could make them self-supporting economically and full partners in international trade. Once this level is reached and these countries could not be already beneficiaries of the preferences under the GSP scheme, it is necessary to articulate transitional measures to alleviate the possible negative effects coming from the withdrawal of the preferences.

Furthermore, impact assessment should be made to analyze the possible consequences of the withdrawal of the preferences on the beneficiary countries. In the case of emerging countries, it has to be analyzed if they are needed of GSP preferences, if not, via graduation system, those preferences for those sectors where these countries are strongly competitive would be gradually withdrawn. However, they should be excluded if they do not obey to human rights, labour, environment, and governance minimum standards.

a no profit organisation

India

Research in International Economic Relations

Please see response to Q.11. Since the declared intention of the EU GSP is to help in alleviating poverty, in principle there can be no question of excluding these countries on the basis of their competitiveness or their presence in the EU market. However, China is a case apart, as it has become a dominant world exporter of manufactures and has captured almost 12 percent share of global exports of manufactures (WTO 2009). China has become the world's factory and it towers above other developing countries and even the developed countries in competitiveness in manufactures. India and Brazil do not come anywhere near China in competitiveness. Their beneficiary status can be reconsidered only when they become high income countries or when they are able to eradicate poverty substantially, whichever happens earlier.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

They should be excluded. The main indicator would be the balance of trade and the rate of growth of GDP.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

Advanced emerging economies with very significant and wide ranging exports to the EU, as well as those having natural advantage from raw material and energy resources should not benefit from the GSP. We believe that those countries, which rank among the top 15 EU import partners, should not be included into the list of beneficiaries.

a company

Malaysia

Export Pepper

Should continue

a company

Malaysia

Manufacturing

Yes, GSP should continue to be available to such traders, as the poverty in these countries remain high.

other

Malaysia

International trade and industry ---- Ministry of International Trade and Industry Malaysia

GSP should be maintained to emerging economies. In general, both micro and macro economics status of each beneficiary country should be considered to determine continued participation in the scheme.

other

Mauritius

International Trade ---- Government official

Big developing and emerging economies should be excluded completely from the scheme. They are highly competitive on the world market and do not need preferences for development.

a company

Myanmar

Information Supply

Yes.

other

Panamá

Servicio ---- Ministerio de Comercio e Industria de Panamá

El actual reglamento incluye a países que se han convertido en importantes actores mundiales en el comercio internacional, incrementando su participación en las exportaciones hacia la UE y el mercado mundial, tales como Brasil, China e India. En este aspecto, el tratamiento preferencial que se le de a dichos países, dependerá de los criterios que la UE considere apropiado establecer para incorporarlos al Régimen SGP.

a company

Philippines

Agriculture and Aquaculture

How can developing countries compete with developed countries when they have all the parameters on their favor? In some instances, their production inputs are subsidized and their govt is right there to purchase the farmer's products at favorable prices while in the Phils, the Law of Supply and Demand dictates the economy at the expense of the Producers

a business association

Portugal

Textile and Clothing Industry

see Answer to Q12

a company

Qatar

Liquified Natural Gas

No comment.

a business association

Spain

Fisheries

Such countries no longer need preferential access under GSP. In order to determine their continued participation, they should be obliged to abide by the social, hygiene and environmental conditions applicable to EU products and production processes.

a business association

Sweden

The Association of Swedish Chambers of Commerce representing Swedish companies. The Swedish Chambers of Commerce are regional, independent, non-profit making organizations, funded by the members.

See the response to question 11 - objective development criteria should determine which countries qualify.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q. 14. Traders want totally free trade. We do not really see any reason for duties except that you can negotiate them. That is the only rationale for duties nowadays. We do not see the need of customs except the chasing of illegal goods such as narcotics. We would like to see a GSP totally open for all the present countries eligible for GSP but for reasons explained above, in the answer to Q 7 we think the countries least in need of GSP should be exempted from the system.

other

Switzerland

Policy research and negotiation assistance ---- International organization

Emerging developing countries should not a priori be excluded. This issue does not seem to have the highest priority for the future GSP, as the EU is aiming to negotiate Free Trade Agreements with Brazil and India. This question seems to be solely targeting China? We imagine that the absolute value of non-oil non-agricultural/industrial/manufactured exports could be used as a variable to exclude those "global actors in international trade".

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

N/A

a citizen

UK

Economic research

On a criterion of countries best able to use trade preferences for development, these are probably the most relevant countries to include in GSP. On the existing criterion of poverty, they are all clearly eligible. It is only on the protectionist criterion of countries which provoke domestic industry in the EU that they would be excluded. They should be included as long as their incomes per capita make them eligible.

a company

UK

Import and Distribution

it should be judged by tariff heading. GSP should be granted if the production meets ecologically sound targets. A combination of carbon footprint to produce, likely effect on climate etc etc.. The more we in Europe can encourage "greener" production in the developing world the better.

a no profit organisation

UK

Development Education, campaigns + advocacy

Measured by GDP such countries are rapidly developing and may well graduate from GSP status. However, there remain serious problems of inequality and poverty within large sectors of these economies. Much of India's GDP growth, for instance, is driven by a thriving IT sector in Hyderabad and a few other areas; yet the World Bank estimates that there are 456 million Indian citizens living on less than \$1.25 a day, mostly in the agricultural sector. (It is worth recalling that the entire population of the EU is not much larger, at 500 million). Removing GSP treatment from the country as a whole would disproportionately disadvantage the least well-off, many millions of whom are living in comparable conditions to the LDCs. Regional and sectoral special treatment should be afforded.

other

UK

Multi sector trade union - public services, manufacturing and commercial services ---- trade union

GMB believes this issue needs serious consideration, and would need to be judged on a case by case basis according to set criteria for judging the "neediness" of the country. If some of these

countries are allowed to remain in the scheme then expectations of them in meeting the criteria must be strengthened considerably. A possible ratcheting up scale requiring them to go beyond basic effective implementation on the conventions might be worth considering. The current situation in China, for instance, in relation to effective implementation of the conventions on trade union rights and freedoms and the right to organise and bargain collectively clearly do not meet the existing criteria. The EU should have expected to see a major improvement in all areas of the conventions listed as these economies have grown in order to continue to qualify, no major global actor should continue to benefit from preferential schemes whilst refusing to move from first base on the listed conventions.

a business association
United Kingdom
Seafood importation
No comment

a no profit organisation
United Kingdom
animal welfare

It is difficult to propose additional horizontal measures with specific reference to animal welfare. Perhaps the overall increase in welfare-enhanced exports, or the percentage of total animal production, or perhaps a reduction in animal health related pandemics or epidemics, where clear scientific evidence can show that such pandemics are related to poor animal husbandry. These are merely suggestions and would require significant study to see if such measures were feasible under the scheme.

a no profit organisation
United Kingdom

Representing workers in all sectors in the UK

It is clear that emerging economies need to be considered on a case by case basis and at a sectoral level. If some of these countries are allowed to remain in the scheme then expectations of them in meeting the criteria must be strengthened considerably. A possible ratcheting up scale requiring them to go beyond basic effective implementation on the conventions might be worth considering. The current situation in China, for instance, in relation to effective implementation of the conventions on trade union rights and freedoms and the right to organise and bargain collectively clearly do not meet the existing criteria. The EU should expect major improvement in all areas of the conventions listed as these economies have grown in order to continue to qualify, no major global actor should continue to benefit from preferential schemes whilst refusing to move from first base on the listed conventions.

Q15: Is it appropriate to maintain access to GSP for transition economies that share many of the same characteristics as developing countries but generally do not self-declare themselves as such? If yes, should any such transition economies nonetheless be excluded from GSP and what criteria should be used to determine this?

a business association
Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Welche Länder unter "transition economies" verstanden werden, ist eine Frage der Definition. Es gilt das unter Pkt. 14 Gesagte. Bereits ausreichend wettbewerbsfähige Länder bedürfen keiner zusätzlichen Präferenz, egal, wie sie sich bezeichnen.

a business association
BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

NO NEED OF SELF DECLARATION. THERE MUST BE A COMMITTEE COMPRISING OF 5 LEAST DEVELOPING COUNTRIES, 3 DEVELOPING COUNTRIES AND 2 TRANSITION COUNTRIES. EU WILL CHAIR THE MEET TO DETERMINE GSP ELIGIBILITY. FURTHER INCOME LEVEL HAS TO PLAY A BIG PART

a business association

BELGIUM

NITROGEN FERTILIZERS

Transition economies moving out of communism demonstrate a variety of very different characteristics - generalisation do not work. But with regard to former soviet union countries near Europe especially Russia, Ukraine, Belarus and to an extent Georgia and Kazakstan they do not merit GSP

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

Transition economies should not be considered as another category of countries in the GSP framework.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

Please consider the answer above: same principle of exclusion should be pursued. There is in fact no proper definition of economies in transition. This absence of definition has led to "assembling" countries whose level of development is substantially different.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

In the context of non-discriminatory application of GSP the criteria used should be as much as possible independent to the self-perception and classification of the country concerned. This over-complicates the tool and defeats the objectives of GSP.

a business association

Belgium

Trade association: Man-made fibres

GSP should not be maintained for transition economies

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

Transition economies should not be considered as yet another category of countries in the GSP framework. This concept refers to the operating mode of certain markets, not to a particular stage of development. A transition economy such as China is in fact an emerging economy whilst a transition economy such as Azerbaijan can be considered as a developing country...

a business association

Belgium

Textiles & Clothing

We should consider that in some of these transition economies the state plays an active role in the economy through subsidies, control and management of companies, defining investment plans, restricting the access to FDI, etc. In this type of situation the country should not be granted GSP.

a business association

Belgium

EUROCHAMBRES, the Brussels-based Association of European Chambers of Commerce and Industry
EUROCHAMBRES is the sole European body that serves the interests of every sector and every size of

European business and the only one so close to business. EUROCHAMBRES has member organizations in 45 countries representing a network of 1,700 regional and local Chambers with over 19.8 million member companies. Chamber members employ over 120 million employees.

We do not see the differences between “transition economies” and “developing countries” so there is no need to make such distinction.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

The distinction between “transition economy” and “developing country” is purely semantic. It is also superfluous if the aforementioned objective development criteria are respected and no exceptions are made for protectionist reasons.

a business association

Belgium

Representing the foreign trade interests of European retail trade

Transition economies should not be excluded from GSP.

a company

Belgium

Import of food items

Ni, see above, pls

a no profit organisation

Belgium

Development NGO

If they do not self-declare themselves as developing countries they should not be given GSP preferences

a no profit organisation

Belgium

Agricultural and Agrifood Trade

No comment.

a no profit organisation

Belgium

trade

NO

a no profit organisation

Belgium

COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

COCERAL agrees with the current internationally agreed definitions and their maintenance in the new GSP Regulation.

other

Belgium

advising our members, interest representation ---- Cefic

No, also “transition economies” are globally competitive enough. They do not need GSP. Graduation mechanism It can be expected that “graduation” (ie the modulation of benefits available under GSP and GSP+ in light of a beneficiary country's relative performance on the EU market for certain groups of products) will remain an important feature of the EU GSP and a key instrument in ensuring that benefits under the scheme are targeted on those countries most in need of them in order to expand their exports to the EU and thereby support their own development.

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

Those kinds of economies should be excluded from the GSP and they could be measured by their GDP growth over a period of time.

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

Ninguna economía debería ser excluida de la lista de países beneficiarios, pero debe darse prioridad a los países en vías de desarrollo.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

Those kinds of economies should be excluded from the GSP and they could be measured by their GDP growth over a period of time

other

BOLIVIA

EXPORTS ---- Government representative

Yes, they should be eliminated by considering some economic characteristics. Self-declaration does not always reflect the reality in the country and they might not need the benefits of a GSP as other low-income countries.

a business association

Brazil

industrial sector

Yes, it is appropriate to maintain access to GSP for transition economies. These economies are subjected to the same criteria that emerging economies, for example, income per capita, which ensures a balance among the criteria for exclusion from the GSP.

a company

Cambodia

Export

In order to accelerate the process of trade liberalization of those countries the EU should grant GSP in a limited level.

a business association

Ecuador

Ecuadorian Exportes Federation

Las economías en transición no cumplen precisamente con los criterios señalados en la respuesta a la pregunta 11.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

The exclusion of transition economies could be considered on the basis of their economic development enabling them to benefit from a transition period in order to allow them to adapt to normal competition conditions in the European Union. It must be pointed out that many of those countries are already members of the EU.

a business association

Finland

Trade Policy

The situation should be carefully studied and no changes should be made without a common understanding of a new regime.

a business association

Finland

Pulp, paper, paperboard and wood products industries interest representation

It is NOT appropriate to maintain access to GSP for transition economies that share many of the same characteristics as developing countries but generally do not self-declare themselves as such.

a company

Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.

Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products

GSP should focus on the Least Developed Countries.

a business association

France

Textile

Yes but with a monitoring system

a business association

Germany

Industry

No, the focus should be on countries which need it most.

a company

GERMANY

PHARMA/CHEMICALS

We are supporting the idea that also "transition economies" should be excluded from GSP, especially if they are globally competitive for specific product groups.

a company

Germany

chemical sector

In our opinion, "transition economies" should also be excluded from GSP, in particular when they are globally competitive for several (chemical) product groups.

a company

Germany

Think-tank for European and international economy and governance

The difference between the EU and transition countries is still too big; so we think that this should be seen, and also the transition countries should know that the EU could not work unlike this, but we do not propose deteriorations for transition countries.

a company

Germany

See above. Eligibility should be based only on economic criteria.

a company

Germany

production of fine chemicals on request - toll manufacturer for fine chemicals

Evaluation in the country should give answers.

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

No, also "transition economies" are globally competitive enough not to need the GSP

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

It is necessary to take into account that the GSP scheme should be targeted on the countries that most need it particularly vulnerable countries least-developed countries. Therefore, this question should be analyzed in depth as well as the impact that this possibility could have on the EU industry and market.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

It is necessary to take into account that the GSP scheme should be targeted on the countries that most need it particularly vulnerable countries least-developed countries. Therefore, this question should be analyzed in depth as well as the impact that this possibility could have on the EU industry and market.

a no profit organisation

India

Research in International Economic Relations

If the transition economies do not self declare themselves to be developing countries they are in effect electing to be excluded from the GSP benefit. If they do not want the benefit there is no point in imposing it on them.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

Yes.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

Economies in transition should be treated in the same way as developing countries. Criteria for inclusion of any country into the list of the GSP's beneficiaries should be based purely on the economic performance indicators.

a company

Malaysia

Manufacturing

yes, transition economies should be given access to GSP, however, depend on the country's per capita income. It should have a cap on certain per capita income as a criteria to have access to GSP

other

Malaysia

International trade and industry ---- Ministry of International Trade and Industry Malaysia

Yes, all transition economies should be treated equally.

other

Mauritius

International Trade ---- Government official

Yes, they should be removed. However countries like SIDS who are vulnerable in view of their inherent characteristics should continue to benefit from the scheme.

a company

Myanmar

Information Supply

Yes it is appropriate, any form of help, is always help.

a company

Qatar

Liquified Natural Gas
No comment.

a company
Qatar
Chemicals and Petrochemicals
Countries who have developed rapidly over the past 30 years should be considered for benefits as they are still building basic infrastructure needed to improve living condition and environmental performance.

a business association
Spain
Fisheries
We would like to insist on the need to maintain the GSP regime in all those countries where EU investments have been made.

a business association
Sweden
The Association of Swedish Chambers of Commerce representing Swedish companies. The Swedish Chambers of Commerce are regional, independent, non-profit making organizations, funded by the members.
We do not see the differences between “transition economies” and “developing countries” so there is no need to make such distinction.

a business association
Sweden
Representing the Swedish textile-, garment-, and shoe import trade
Q 15. Se answers to Q 7 and Q 14. Countries in transition should be exempted from the system.

other
Switzerland
Policy research and negotiation assistance ---- International organization
This is a remnant from the Cold war period. We do not see a reason to exclude certain countries simply because they are ex-Communist. An example would be Tajikistan.

other
Thailand
Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce
N/A

a citizen
UK
Economic research
A clear income criterion for eligibility would solve this problem.

a company
UK
Import and Distribution
not sure

a business association
United Kingdom
Seafood importation
No comment

Q16: Should graduation be linked to any other economic indicators instead of or as well as the current indicator (relative share in GSP covered imports)?

a business association

Argentina

Argentine Oil Industry Chamber

It should be added an indicator linked to export concentrations in the beneficiary country of the section that under the current regime (art 13.1 Regulation 732/2008) would be excluded of GSP. A similar provision is considered under art. 3.1 for excluding a beneficiary country. Consequently, a section in a beneficiary country should not be excluded if the UE is the main importer of that product or it embraces most of the total exports of that beneficiary country.

a business association

Argentina

Argentine Biofuels Chamber

It should be added an indicator linked to export concentrations in the beneficiary country of the section that under the current regime (art 13.1 Regulation 732/2008) would be excluded of GSP. A similar provision is considered under art. 3.1 for excluding a beneficiary country. Consequently, a section in a beneficiary country should not be excluded if the UE is the main importer of that product or it embraces most of the total exports of that beneficiary country.

a business association

Argentina

Rosario Board of Trade

It should be added an indicator linked to export concentrations in the beneficiary country of the section that under the current regime (art 13.1 Regulation 732/2008) would be excluded of GSP. A similar provision is considered under art. 3.1 for excluding a beneficiary country. Consequently, a section in a beneficiary country should not be excluded if the UE is the main importer of that product or it embraces most of the total exports of that beneficiary country.

a business association

Argentina

Buenos Aires Grain Exchange

It should be added an indicator linked to export concentrations in the beneficiary country of the section that under the current regime (art 13.1 Regulation 732/2008) would be excluded of GSP. A similar provision is considered under art. 3.1 for excluding a beneficiary country. Consequently, a section in a beneficiary country should not be excluded if the UE is the main importer of that product or it embraces most of the total exports of that beneficiary country.

a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

It should be added an indicator linked to export concentrations in the beneficiary country of the section that under the current regime (art 13.1 Regulation 732/2008) would be excluded of GSP. A similar provision is considered under art. 3.1 for excluding a beneficiary country. Consequently, a section in a beneficiary country should not be excluded if the UE is the main importer of that product or it embraces most of the total exports of that beneficiary country.

a business association

Argentina

Bahia Blanca Grain Exchange

It should be added an indicator linked to export concentrations in the beneficiary country of the section that under the current regime (art 13.1 Regulation 732/2008) would be excluded of GSP. A similar provision is considered under art. 3.1 for excluding a beneficiary country. Consequently, a section in a beneficiary country should not be excluded if the UE is the main importer of that product or it embraces most of the total exports of that beneficiary country.

a no profit organisation

Argentina

Export services

An indicator linked to export concentrations in the beneficiary country should be added, that is, a section in a beneficiary country should not be excluded if the UE is the main importer of that product or it embraces most of the total exports of that beneficiary country.

a no profit organisation

Argentina

Research on international Negotiations

It should be added an indicator linked to export concentrations in the beneficiary country of the section that under the current regime (art 13.1 Regulation 732/2008) would be excluded of GSP. A similar provision is considered under art. 3.1 for excluding a beneficiary country. Consequently, a section in a beneficiary country should not be excluded if the UE is the main importer of that product or it embraces most of the total exports of that beneficiary country.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Consideramos importante incluir dentro de los parámetros de graduación un indicador que haga referencia a la concentración de las exportaciones del beneficiario en la sección que resultaría excluida de aplicar las reglas actuales (art. 13.1 Reglamento (CE) N° 732/2008). Entendemos que no correspondería excluir una sección en relación a un país determinado si la UE es el principal destino de las exportaciones de ese producto o si ese producto es importante en el total de las exportaciones del país beneficiario.

a business association

Argentine

Argentine Soybean Chain Association

It should be added an indicator linked to export concentrations in the beneficiary country of the section that under the current regime (art 13.1 Regulation 732/2008) would be excluded of GSP. A similar provision is considered under art. 3.1 for excluding a beneficiary country. Consequently, a section in a beneficiary country should not be excluded if the UE is the main importer of that product or it embraces most of the total exports of that beneficiary country.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Der Graduierungsmechanismus hat eine wesentliche Bedeutung, um APS-Begünstigungen zielgenau jenen Ländern zur Verfügung zu stellen, die sie am Notwendigsten brauchen und gleichzeitig jene herauszunehmen, die hier bereits eine hohe Entwicklung erreicht haben. Wir sehen keine Notwendigkeit, die Kriterien und vor allem deren Höhe zu verändern.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

ECONOMIES DOING WELL AND BE SUSTAINABLE IN THE LONG RUN CAN BE MEASURED EASILY WITH THE CURRENT ECONOMIC TOOLS. INDEPENDENT BODIES MUST BE CREATED TO DO THIS JOB. THE VERY END RESULT IS TO SEE THAT COUNTRIES GRADUATE TO NONGSP COUNTRIES GIVING CHANCE TO THE REST TO MOVE FASTER!!

a business association

Belgium

International trade in flowers

Although the criterion of a relative share in GSP covered imports simplifies the GSP scheme, the percentage can, however, not be considered as an objective development criterion. The idea that countries should become ineligible for preferences once they account for x% of the value of the EU imports runs contrary to the purpose of encouraging development. Union Fleurs supports the application of more objective development criteria, e.g. the GDP per capita. This criterion would be as simple to apply as a percentage. However, should the European

Institutions accept import share as a suitable criterion, we strongly recommend a high percentage for all products.

a business association

Belgium

Renewable energies

Competitiveness with the EU industry should be the criteria for graduation, complemented with import volumes. Biodiesel made from Argentine soybean oil (SME) is cheaper by some 50 USD/metric ton than European-made biodiesel based on rapeseed oil (RME), with a difference peaking at 100 USD/metric ton during the summer 2009. When it comes to Indonesian or Malaysian palm oil biodiesel (PME), the price difference reaches 100 USD/metric ton and 200 USD/metric from August to mid-September 2009. A 100 USD/metric ton and 200 USD/metric respectively equal 10% and 20% of the price for biodiesel produced from rapeseed oil in the EU, accounting for a large competitive advantage in favour of the Malaysian and Indonesian producers. It would seem logical to remove tariff preferences for sectors having reached the level of development of their counterparts in developed countries.

a business association

BELGIUM

NITROGEN FERTILIZERS

Graduation should be linked to injurious unfair trade complaints - upon opening of an investigation by the Commission the GSP benefits should be immediately removed.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

Yes. The calculation of diversification of exports based on the real structure of a country's total exports, instead of only exports covered by the GSP; In addition, if policies are operated domestically that have distorting impact on global competition in that sector, graduation of the country should be automatic for that product. The EU should not reward countries that deliberately distort global markets.

a business association

Belgium

International trade

Although the criterion of a relative share in GSP covered imports simplifies the GSP scheme, the percentage can, however, not be considered as an objective development criterion. The idea that countries should become ineligible for preferences once they account for x% of the value of the EU imports runs counter to the purpose of encouraging development. FRUCOM supports the application of more objective development criteria, e.g. the GDP per capita. This criterion would be as simple to apply as a percentage. However, should the European Institutions accept import share as a suitable criterion, we strongly recommend a high percentage for all products.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance
The share of imports is, per se, quite a good indicator. But there is a perverse effect of keeping at the same time a tariff preference (GSP) and trade defence measures for the same product/origin. When trade measures are imposed, they have a slow down effect on the imports flow...and hence, may contribute to "de-graduation" which does not make sense. This is again why, when a product/origin is subject to trade defence measures, that product/origin should be excluded from the tariff preference;

a business association

Belgium

Wood products

The indicator is not clear: 15% of the imports of this product or 15% of the total imports from this country? If 15% of the extra-EU imports of a certain product are fulfilled by one country, benefiting from GSP this is far too much: the threshold should be below 15%. Also, if a period of

3 years is taken into account, the damage is lasting 3 years before action is possible. A quicker intervention mechanism should be installed.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

(i) The need for a definition guaranteeing legal certainty The Regulation should clarify that the relative share in GSP covered imports are the imports that actually received GSP benefits and not all imports that are potentially eligible for GSP. The GSP Regulation itself does not use the words “GSP-covered tariff lines”. The 2004 Commission Communication explicitly states that the graduation criterion is “the share of the Community market, expressed as a share of preferential imports”. The Commission’s fear that by not showing the imports from graduated countries would almost automatically lead to de-graduation of those countries is not an argument against the use of actual GSP imports. Not only does the current Regulation contain no provisions for how de-graduation should occur but, in addition, there is no need to use the same criteria for graduation and de-graduation and the development objective sought by the GSP is achieved only if imports actually benefiting from the GSP are taken into account.

(ii) Statistical database Publicly available databases such as COMEXT should be used. The use of restricted databases creates a lack of transparency in the system and impairs the right of interested parties to anticipate whether graduation may occur, which is important especially for industries with long supply chains. Also, the use of publicly available data is important in terms of the right of GSP stakeholders to be heard; at the very least the Commission’s calculations should be open for inspection by interested parties.

(iii) Other economic factors Other trade measures that have a direct impact on a beneficiary country’s GSP imports into the EU (e.g., anti-dumping, anti-subsidy or safeguard measures) should be taken into consideration when a competitiveness analysis under the graduation mechanism is carried out. Where these measures have had an impact on the thresholds for graduation, these thresholds cannot be applied mechanically. One way of doing so would be to consider a period different from the “most recent three year period”, i.e. a period not affected by the trade policy measures.

a business association

Belgium

Trade association: Man-made fibres

Per capita GNP should be included as should a poverty index

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

Cf. reply to Q14. In particular, if policies operated domestically and on export by a country in a certain industrial sector are having a systemic and distorting impact on global competition in that sector, graduation of the country should be automatic for that sector. In addition, the current graduation system has revealed a major weakness on the occasion of the last review i.e. if a beneficiary country acquires a dominant position in the system, the economic justification for graduating other countries for certain products is entirely masked and this results eventually in the unjustified de-graduation of the latter countries.

a business association

Belgium

Textiles & Clothing

The Graduation Mechanism remains an important instrument to ensure that the benefits are granted to countries that really need them. In this framework the graduation threshold should consider the overall exports of a product section a beneficiary country and not just the ones covered by GSP. Additionally as mentioned above we should enlarge the criteria and include other elements (raw materials, trade facilitation measures, protection and enforcement of IP Rights, FDI safeguard) which could be considered for graduation purposes even in cases where the thresholds for triggering graduation (12,5% for Textiles and Clothing) are not met.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

While EuroCommerce acknowledges that the relative share in GSP covered imports contributes to the simplification of the GSP, the percentage can, however, not be considered as an objective development criterion. The idea that countries should become ineligible for preferences once they account for x% of developing world exports to the EU runs counter to the purpose of encouraging development. EuroCommerce reiterates its call for applying objective development criteria, e.g. the GDP per capita. This criterion would be as simple to apply as a percentage. However, should the European Institutions accept import share as a suitable criterion, we strongly recommend a high percentage for all products.

a business association

Belgium

Representing the foreign trade interests of European retail trade

Graduation should not only be linked to the relative share in GSP covered imports. Graduation should also take into consideration the GDP per capita as well as the overall economic situation of a country.

a citizen

Belgium

Finance

No

a company

Belgium

Import of food items

As stated before : the benefits are only scheduled to maximize profits in and for multinational monopolists in the EU and the USA, and most probably in the near future also in China, in India and in Brazil

a no profit organisation

Belgium

Development NGO

See Q11

a no profit organisation

Belgium

Agricultural and Agrifood Trade

Agri-food operators support a predictable and stable graduation system, with an integrated review scheduled every three years.

a no profit organisation

Belgium

trade

The current indicator is appropriated

a no profit organisation

Belgium

COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

COCERAL is in favour of a predictable and stable graduation system, in which a review is scheduled every three years. Additionally the Commission should ensure continuous monitoring and the updating of stakeholders on possible changes, as well as clear information on deadlines for improvement to countries that seems to fail certain requirements instead of abrupt announcements on the retraction of preferences.

other

Belgium

Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)

EBCA believes that although the graduation system is a good one and should be continued, there are a number of ways in which its effectiveness could be improved:

(i) A definition guaranteeing legal certainty The Regulation should clarify that the relative share in GSP covered imports are the imports that actually received GSP benefits and not all imports that are potentially eligible for GSP. The GSP Regulation itself does not use the words "GSP-covered tariff lines."

The 2004 Commission Communication explicitly states that the graduation criterion is "the share of the Community market, expressed as a share of preferential imports". The fact that by not showing the imports from graduated countries would almost automatically lead to degradation of those countries is not an argument against the use of actual GSP imports. Not only does the current Regulation contain no provisions of how degradation should occur but, in addition, there is no need to use the same criteria for graduation and degradation and the development objective sought by the GSP is achieved only if imports actually benefiting from the GSP are taken into account.

(ii) Statistical database Publicly available databases should be used such as the COMEXT data based that is specifically mentioned in the Regulation. The use of restricted databases impairs the right of interested parties to anticipate whether graduation may occur which is important especially for industries with long supply chains. As well, the use of publicly available data is important in terms of the right to be heard of the GSP stakeholders and, at the very least, the Commission's calculations must be provided to interested parties. EBCA members would hope to see more transparency on this issue in the revised framework.

(iii) Other economic factors Other trade measures that have a direct impact on a beneficiary country's GSP imports into the EU (e.g., anti-dumping, anti-subsidy or safeguard measures) should be taken into consideration when a competitiveness analysis under the graduation mechanism is carried out. Where these measures have had an impact on the thresholds for graduation, these thresholds cannot be applied mechanically. One way of doing so would be to consider a period different from the "most recent three year period", i.e. a period not affected by the commercial policy measures.

other

Belgium

advising our members, interest representation ---- Cefic

General comments: The existing graduation mechanism no longer reflects changing conditions in the global economy. EU chemical producers are noting that developing countries and especially emerging economies have the prerequisite production know-how, adequate production plants and capital providers for specific products from the chemical production range. Consequently, these countries are increasingly taking up a role as competitive suppliers of chemical products on the world market and can no longer be seen as "in need of development", where these individual products are concerned. Moreover, production in these countries is less costly than in the EU (labour and raw material costs) and frequently encouraged by subsidy-like measures ("dual pricing").

Additionally, the EU grants tariff preferences. Cefic strongly advocates that countries applying unfair practices such as dual-pricing and export taxes should be removed from the GSP scheme. One good example is polycarbonate. Large quantities of this plastic material are used in industrial production worldwide (global demand in 2008: ca. 3.000 kilotons), e.g. for compact discs, car headlights, packagings, displays and many more applications. European producers were leading in this field for a long time. But meanwhile the situation has changed fundamentally. Today some beneficiary countries are operating large chemical plants and building new ones. Existing plants and plants under construction meet the state-of-the-art; their products meet the highest standards. Furthermore, capacities of plants enable them to exceed by far the demand on local markets - with production being planned for world market requirements.

Another interesting point is that investors favour beneficiary countries as locations for such plants, for strategic reasons. Conversely, many beneficiary countries charge high import tariffs on such products. Moreover, they additionally impose regional taxes and levies as artificial price

increases for import products. Put simply, it can be stated that beneficiary countries have become competitive especially in those fields of products which are protected by the highest external tariffs. Thus we note increasing global competitiveness of beneficiary countries for certain fields of products on the one hand, and disadvantages for European producers of the same products on the other.

Comments on the graduation indicator: There is another general problem: the graduation indicator is meant to show whether a beneficiary country has a widely diverse export structure. Where this is not the case, the country qualifies for support. However, only exports falling under the GSP are taken into account - there is no examination of the country's entire export structure. As the GSP does not comprise all tariff lines, the country also exports products at "normal" tariffs (most favoured nation). Example: A case might occur where a country exports e.g. 90 products at the most-favoured nation duty rate and only two products at the preferential tariff rate.

In an examination of whether this country has a diversified export structure, only the two products falling under GSP would be taken into consideration, with the other 90 products being ignored. This would result in a totally distorted picture of the country's export structure, leading to wrong conclusions. For this reason, existing practice in graduation - i.e. considering only the share of exports falling under GSP - cannot be kept up: the entire export structure needs to be analysed.

a no profit organisation

Belgium, Brussels

leather sector. COTANCE represents interests of National Associations of Tanners and Dressers

The relative share in GSP covered imports is not the optimal indicator as the EU market could well not be the most relevant market for a product. The relative share of global exports of the products concerned should be used as indicator for graduating a country for particular products.

a no profit organisation

Bolivia

Exportaciones

no

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

No

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

Los mecanismos de graduación deberían mantenerse como se encuentran actualmente.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

No

a no profit organisation

Bolivia

industry

NO

other

BOLIVIA

EXPORTS ---- Government representative

Good idea. It is always good to be supported by facts and statistics.

other

Bolivia

Government ---- Government Official

It is an issue that should be investigated more by experts.

other

Bolivia

Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio

No

a business association

Brazil

industrial sector

As the graduation mechanism affects only specific product sections, the relative share in GSP covered imports is the most objective method. Others indicators could give edge so that beneficiary countries could be graduated.

other

Brazil

Government ---- Ministry of External Relations - Federative Republic of Brazil

The present EU GSP Regulation establishes that the relative share for graduation purposes shall be calculated as the total exports of a beneficiary country for a section of products covered by the EU GSP in relation to the total exports covered by the EU GSP of all beneficiary countries to the EU. Since data on the imports under the EU GSP are not available on the links which were presented along with this questionnaire and since the EU has not disclosed GSP trade data regardless of repeated demands from Brazil, it would be imperative that the new GSP regulation explicitly considered for graduation purposes the relative share of a GSP covered tariff line in relation to the total values exported to the EU for this same tariff line for all countries, regardless if they are beneficiaries or not of the EU GSP and regardless of the total values imported under the GSP. Such a provision would certainly enhance the transparency on which conditions certain products are graduated from the EU GSP benefits.

a company

Cambodia

Export

From my opinion, it remains important and effective in the graduation mechanism of the GSP used by the EU.

other

Colombia

Tourism and Trade (Import-Export) ---- Government of Colombia

Colombia considers that graduation should not be applied to countries fighting against the production and marketing of illicit drugs, namely the beneficiaries of the GSP Plus, in the same manner as to EBA countries.

a business association

Ecuador

Ecuadorian Exportes Federation

Los indicadores planteados en el Artículo 13 del Reglamento 732/2008 son suficientes para cumplir los objetivos del mecanismo de graduación. Lo que debería modificarse son los umbrales a favor de no imponer condiciones de graduación para productos para los que se alcanza una competitividad especial al cabo de esfuerzo y sacrificio. Habría que aclarar que los países que quedan en el esquema no serán afectados por la graduación por efecto de que el volumen total de exportaciones de los beneficiarios se reduce porque algunos beneficiarios abandonan el esquema por suscribir acuerdos comerciales bilaterales.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

The indicators as per on Article 13 of Regulation 732/2008 are sufficient to comply with the graduation mechanism objectives. Therefore, it is not advisable to modify them.

a business association

Finland

Trade Policy

The system should be as easy and predictable as possible and there should be a solid argumentation for making changes.

a company

Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.

Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products

Trade measures (tariff level) and in particular unfair trade measures that the beneficiary country maintains on the products in question.

a business association

France

Textile

The share of the community market expressed as share preferential imports should be maintained at its current level.

a business association

Germany

Industry

The existing graduation mechanism no longer reflects changing conditions in the global economy. EU producers in many industry sectors are noting that developing countries and especially emerging economies have the prerequisite production know-how, adequate production plants and capital providers for concrete products from the chemical production range. Consequently, these countries are increasingly taking up a role as competitive suppliers of industrial products on the world market and can no longer be seen as "in need of development" or special favours by the EU, where these individual products are concerned. Moreover, production in these countries is less costly than in the EU (labour and raw material costs) and frequently encouraged by subsidy-like measures ("dual pricing"). Additionally, the EU grants tariff preferences. In a simplified form, it can be said that beneficiary countries have become competitive especially in those fields of products which are protected by the highest external tariffs. Thus we note increasing global competitiveness from beneficiary countries for certain fields of products on the one side, and disadvantages for European producers of the same products on the other.

There is a further general problem: the graduation indicator is meant to show whether a beneficiary country has a widely diverse export structure. Where this is not the case, the country qualifies for support. However, only exports falling under the GSP are taken into account - there is no examination of the country's entire export structure. As the GSP does not comprise all tariff lines, the country also exports products at "normal" tariffs (most favoured nation). Example: A case might occur where a country exports e.g. 90 products at the most-favoured nation duty rate and only two products at the preferential tariff rate.

In an examination of whether this country has a diversified export structure, only the two products falling under GSP would be taken into consideration, with the other 90 products being ignored. This would result in a totally distorted picture of the country's export structure, leading to wrong conclusions. For this reason, existing practice in graduation - i.e. considering only the share of exports falling under GSP - cannot be kept up: the entire export structure needs to be analysed.

a company

GERMANY

PHARMA/CHEMICALS

As a matter of principle, we would like to emphasize our view that the existing graduation mechanism does no longer reflect the changing conditions in the global economy. Developing countries and especially emerging economies have the prerequisite production know-how, adequate production plants and capital providers for specific products from the chemical production range. Consequently, these countries are increasingly taking up a role as

competitive suppliers of (chemical) products on the world market and can no longer be seen as "in need of development", where these individual products are concerned. Moreover, production in these countries is less costly than in the EU (labour and raw material costs) and frequently encouraged by subsidy-like measures ("dual pricing").

Additionally, the EU grants tariff preferences. We are supporting the opinion that countries applying unfair practices such as dual-pricing and export taxes should be removed from the GSP scheme. One good example is polycarbonate. Large quantities of this plastic material are used in industrial production worldwide (global demand in 2008: ca. 3.000 kilotons), e.g. for compact discs, car headlights, packagings, displays and many more applications. European producers were leading in this field for a long time. But meanwhile the situation has changed fundamentally.

Today some beneficiary countries are operating large chemical plants and building new ones. Existing plants and plants under construction meet the state-of-the-art; their products meet the highest standards. Furthermore, capacities of plants enable them to exceed by far the demand on local markets - with production being planned for world market requirements. Another interesting point is that investors favor beneficiary countries as locations for such plants, for strategic reasons. Conversely, many beneficiary countries charge high import tariffs on such products.

Moreover, they additionally impose regional taxes and levies as artificial price increases for import products. It can be stated that beneficiary countries have become competitive especially in those fields of products which are protected by the highest external tariffs. Thus we note increasing global competitiveness of beneficiary countries for certain fields of products on the one hand, and disadvantages for European producers of the same products on the other.

In our view specific comments need to be retained also on the graduation indicator. The graduation indicator is meant to show whether a beneficiary country has a widely diverse export structure. Where this is not the case, the country qualifies for support. However, only exports falling under the GSP are taken into account - there is no examination of the country's entire export structure. As the GSP does not comprise all tariff lines, the country also exports products at "normal" tariffs (most favored nation). Example: A case might occur where a country exports e.g. 90 products at the most-favored nation duty rate and only two products at the preferential tariff rate. In an examination of whether this country has a diversified export structure, only the two products falling under GSP would be taken into consideration, with the other 90 products being ignored. This would result in a totally distorted picture of the country's export structure, leading to wrong conclusions. For this reason, existing practice in graduation - i.e. considering only the share of exports falling under GSP - cannot be kept up: the entire export structure needs to be analyzed.

The diversification criterion must take account of a country's total exports into the EU and not only the exports covered by GSP. This also applies for the rules governing exclusion from graduation. Graduation should also be possible on a targeted basis for individual positions and sub-positions of a product section if the producers in the preference countries are internationally competitive. The observation phase in the framework of graduation should be shortened (e.g. at most one year).

a company
Germany
chemical sector

The existing graduation mechanism does not properly reflect the changed global economic reality anno 2010. Several "developing countries", and especially emerging economies, often have the prerequisite production know-how, adequate production plants and capital providers for concrete products from the chemical production range. Consequently, these countries are increasingly taking up a role as competitive suppliers of chemical products on the world market and can no longer be seen as "in need of development" for these individual products. Moreover, production in these countries is often less costly than in the EU (labour and raw material costs) and frequently encouraged by subsidy-like measures ("dual pricing").

The GSP mechanism hereby causes a further competitive disadvantage on top of above mentioned factors. Countries applying unfair practices such as dual-pricing and export taxes should be removed from the GSP scheme.

Today several beneficiary countries are operating and even expanding large new state-of-the-art chemical plants with substantial capacities to be further exported towards the European market, as these capacities often exceed by far the demand on local markets. Apart from that,

there is a further general problem: the graduation indicator is meant to show whether a beneficiary country has a widely diverse export structure. Where this is not the case, the country qualifies for tariff preferences.

However, only exports falling under the GSP are taken into account - there is no examination of the country's entire export structure. As the GSP does not comprise all tariff lines, the country also exports products at "normal" tariffs (most favored nation). Example: A case might occur where a country exports e.g. 90 products at the most-favoured nation duty rate and only two products at the preferential tariff rate. In an examination of whether this country has a diversified export structure, only the two products falling under GSP would be taken into consideration, with the other 90 products being ignored. This would result in a totally distorted picture of the country's export structure, leading to wrong conclusions.

For this reason, existing practice in graduation - i.e. considering only the share of exports falling under GSP - cannot be kept up: the entire export structure needs to be analyzed.

a company

Germany

Think-tank for European and international economy and governance

Maybe it would help if the EU COM says that some of the consulted persons proposed also democracy, governance, HRs etc. ? ;)

a company

Germany

Graduation should be based on a thorough competitiveness analysis of each sector. Indicators should be •Coverage of domestic demand, non-dependence on imports •Export ratio of local production •Availability of new technologies to secure and improve competitiveness, including FDI and JVs •Availability of sound local suppliers

a company

germany

chemical production

The preferences shall be linked to fair working conditions for the workers in developing countries comparable to those in the EU, esp. for occupational health, safety and environmental protection.

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

General comments: The existing graduation mechanism no longer reflects changing conditions in the global economy. EU chemical producers are noting that developing countries and especially emerging economies have the prerequisite production know-how, adequate production plants and capital providers for concrete products from the chemical production range. Consequently, these countries are increasingly taking up a role as competitive suppliers of chemical products on the world market and can no be longer be seen as "in need of development", where these individual products are concerned. Moreover, production in these countries is less costly than in the EU (labour and raw material costs) and frequently encouraged by subsidy-like measures ("dual pricing").

Additionally, the EU grants tariff preferences. One good example is polycarbonate. Large quantities of this plastic material are used in industrial production worldwide (global demand in 2008: ca. 3.000 kilotons), e.g. for compact discs, car headlights, packagings, displays and many more applications. European producers were leading in this field for a long time. But meanwhile the situation has changed fundamentally. Today some beneficiary countries are operating large chemical plants and building new ones. Existing plants and plants under construction meet the state-of-the-art; their products come up to the highest expectations.

Furthermore, capacities of plants enable them to exceed by far the demand on local markets - with production being planned for world market requirements. Another interesting point is that investors favour beneficiary countries as locations for such plants, for strategic reasons. Conversely, many beneficiary countries charge high import tariffs on such products. Moreover, they additionally impose regional taxes and levies as artificial price increases for import products. One example is bioethanol, with such treatment of imports in Brazil. In a simplified

form, it can be said that beneficiary countries have become competitive especially in those fields of products which are protected by the highest external tariffs. Thus we note increasing global competitiveness from beneficiary countries for certain fields of products on the one side, and disadvantages for European producers of the same products on the other.

Comments on the graduation indicator: There is a further general problem: the graduation indicator is meant to show whether a beneficiary country has a widely diverse export structure. Where this is not the case, the country qualifies for support. However, only exports falling under the GSP are taken into account - there is no examination of the country's entire export structure. As the GSP does not comprise all tariff lines, the country also exports products at "normal" tariffs (most favoured nation). Example: A case might occur where a country exports e.g. 90 products at the most-favoured nation duty rate and only two products at the preferential tariff rate. In an examination of whether this country has a diversified export structure, only the two products falling under GSP would be taken into consideration, with the other 90 products being ignored. This would result in a totally distorted picture of the country's export structure, leading to wrong conclusions. For this reason, existing practice in graduation - i.e. considering only the share of exports falling under GSP - cannot be kept up: the entire export structure needs to be analysed.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

The current indicator is considered valid. The competitiveness of a certain country for a specific sector could be also considered.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

The current indicator is considered valid. The competitiveness of a certain country for a specific sector could be also considered.

a no profit organisation

India

Research in International Economic Relations

Graduation of the country as a whole from the GSP benefit makes sense if it attains a high level of development and/or becomes a high income country. Product specific graduation on the basis of market share or competitive need in respect of individual products or product groups has never made sense. Large countries are bound to have a larger presence in the market in respect of one or two products or product groups. Poverty may persist in these countries even if they export large volumes of one or two products or product groups. It would be another matter if a developing country becomes a dominant exporter of manufactures and captures say a share of twelve percent or more of world trade in manufactures, as China has. In that event its graduation should be considered as a country and not on a product specific basis.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

Yes. see answer to Q14.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

Graduation is a highly relevant instrument in the current GSP, since it includes into the list of the beneficiary countries such highly competitive emerging economies as the BRIC countries. However, even if emerging economies are to be excluded from the list of beneficiaries, in

certain cases it could be relevant to graduate certain products coming from the very competitive beneficiaries so as to guarantee preferential margin for less competitive economies.

a company
Malaysia
Textile
Yes

a company
Malaysia
Manufacturing
Yes.

a company
Malaysia
Manufacturer
Yes

other
Malaysia
International trade and industry ---- Ministry of International Trade and Industry Malaysia
The economic indicators are also suggested to be referred with other foreign and international forum such as World Economic Forum and other reliable economic international bodies for overall views and inputs prior to the graduation mechanism.

a company
Myanmar
Information Supply
No.

a business association
Portugal
Textile and Clothing Industry
The Graduation Mechanism remains an important instrument to ensure that the benefits are granted to countries that really need them. In this framework the graduation threshold should be linked to the overall exports of a beneficiary country and not just the ones covered by GSP. Additionally as mentioned before we should enlarge the criteria and include other elements (raw materials, trade facilitation measures, protection and enforcement of IP Rights, FDI safeguard) which could be considered for graduation purposes even in cases where the thresholds for triggering graduation (12,5% for Textiles and Clothing) are not met.

a company
Qatar
Liquified Natural Gas
No comment.

a business association
Sweden
Representing the Swedish textile-, garment-, and shoe import trade
Q 16. In our proposal there is no need of a graduation rule. At present countries get punished for successful use of GSP, that is not good. If graduation can not be avoided we think it should be based on economic indicators only.

other
Switzerland
Policy research and negotiation assistance ---- International organization
Other trade indicators might include export concentration, manufactured exports / capita, raw material export dependency and indicators related to production.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

Yes. Thailand is of the view that the share of overall GSP imports can appropriately be used as an economic indicator for graduation. Also, Thailand is of the view that the same threshold of 15 per cent should be applied equally to all products including textiles.

a citizen

UK

Economic research

Relative performance on the EU market is not relevant to measuring either suitability for trade performances or poverty; modulation should therefore be removed from GSP and GSP+ as it is only a way of appeasing inefficient EU industries.

a company

UK

Import and Distribution

it's fine as it is

a no profit organisation

UK

Development Education, campaigns + advocacy

The conditions of the least advantaged citizens within the country should be taken into account. Where graduation would harm the least well off, regardless of the aggregate economic conditions in the country, graduation should not take place. Thus if a country is otherwise deemed ready to graduate, but those in the poorest decile (who may be concentrated in a particular industrial or agricultural sector) would have reduced market access, graduation should not take place.

a business association

United Kingdom

Seafood importation

No comment

Q17: Should graduation continue to be calculated on the basis of product sections, which typically cover a large group of products and thereby makes qualification for graduation less likely to be achieved, or should it rather be based on a more detailed product grouping, and if so at what level?

a business association

Argentina

Argentine Oil Industry Chamber

The graduation mechanism has proved to be very efficient to achieve EU goals. In this sense, it should continue to be calculated on the basis of product sections in order to diminish the non-typical behavior of one single tariff line. This method gives the regimen the needed stability for economic operators in their international strategy. In spite of that, the withdrawn of GSP treatment should be set at CN Code instead by entire section with the view to avoid a damage to products that are related. As a "second best" it should be established that when a tariff line (8 digits) imports are bigger than an X% of a given section, only that line would be excluded.

a business association

Argentina

Argentine Biofuels Chamber

The graduation mechanism has proved to be very efficient to achieve EU goals. In this sense, it should continue to be calculated on the basis of product sections in order to diminish the non-

typical behavior of one single tariff line. This method gives the regimen the needed stability for economic operators in their international strategy. In spite of that, the withdrawn of GSP treatment should be set at CN Code instead by entire section with the view to avoid a damage to products that are related. As a “second best” it should be established that when a tariff line (8 digits) imports are bigger than an X% of a given section, only that line would be excluded.

a business association

Argentina

Rosario Board of Trade

The graduation mechanism has proved to be very efficient to achieve EU goals. In this sense, it should continue to be calculated on the basis of product sections in order to diminish the non-typical behavior of one single tariff line. This method gives the regimen the needed stability for economic operators in their international strategy. In spite of that, the withdrawn of GSP treatment should be set at CN Code instead by entire section with the view to avoid a damage to products that are related. As a “second best” it should be established that when a tariff line (8 digits) imports are bigger than an X% of a given section, only that line would be excluded.

a business association

Argentina

Buenos Aires Grain Exchange

The graduation mechanism has proved to be very efficient to achieve EU goals. In this sense, it should continue to be calculated on the basis of product sections in order to diminish the non-typical behavior of one single tariff line. This method gives the regimen the needed stability for economic operators in their international strategy. In spite of that, the withdrawn of GSP treatment should be set at CN Code instead by entire section with the view to avoid a damage to products that are related. As a “second best” it should be established that when a tariff line (8 digits) imports are bigger than an X% of a given section, only that line would be excluded.

a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

The graduation mechanism has proved to be very efficient to achieve EU goals. In this sense, it should continue to be calculated on the basis of product sections in order to diminish the non-typical behavior of one single tariff line. This method gives the regimen the needed stability for economic operators in their international strategy. In spite of that, the withdrawn of GSP treatment should be set at CN Code instead by entire section with the view to avoid a damage to products that are related. As a “second best” it should be established that when a tariff line (8 digits) imports are bigger than an X% of a given section, only that line would be excluded.

a business association

Argentina

Bahia Blanca Grain Exchange

The graduation mechanism has proved to be very efficient to achieve EU goals. In this sense, it should continue to be calculated on the basis of product sections in order to diminish the non-typical behavior of one single tariff line. This method gives the regimen the needed stability for economic operators in their international strategy. In spite of that, the withdrawn of GSP treatment should be set at CN Code instead by entire section with the view to avoid a damage to products that are related. As a “second best” it should be established that when a tariff line (8 digits) imports are bigger than an X% of a given section, only that line would be excluded.

a no profit organisation

Argentina

Export services

The graduation mechanism has proved to be very efficient to achieve EU goals. In this sense, it should continue to be calculated on the basis of product sections in order to diminish the non-typical behavior of one single tariff line. This method gives the regimen the needed stability for economic operators in their international strategy. In spite of that, the withdrawn of GSP treatment should be set at CN Code instead by entire section with the view to avoid a damage to products that are related.

a no profit organisation

Argentina

Research on international Negotiations

The graduation mechanism has proved to be very efficient to achieve EU goals. In this sense, it should continue to be calculated on the basis of product sections in order to diminish the non-typical behavior of one single tariff line. This method gives the regimen the needed stability for economic operators in their international strategy. In spite of that, the withdrawn of GSP treatment should be set at CN Code instead by entire section with the view to avoid a damage to products that are related. As a “second best” it should be established that when a tariff line (8 digits) imports are bigger than an X% of a given section, only that line would be excluded.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Entendemos que la graduación de un producto debería continuar calculándose por secciones, dado que este método logra minimizar el impacto de los comportamientos anómalos que puede tener una sola línea arancelaria. No obstante ello, una vez identificado el aumento de las importaciones debería identificarse un producto a excluir y sólo para este producto debería eliminarse la preferencia y no para el resto de los productos de la sección.

a business association

Argentine

Argentine Soybean Chain Association

The graduation mechanism has proved to be very efficient to achieve EU goals. In this sense, it should continue to be calculated on the basis of product sections in order to diminish the non-typical behavior of one single tariff line. This method gives the regimen the needed stability for economic operators in their international strategy. In spite of that, the withdrawn of GSP treatment should be set at CN Code instead by entire section with the view to avoid a damage to products that are related. As a “second best” it should be established that when a tariff line (8 digits) imports are bigger than an X% of a given section, only that line would be excluded.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Um diese Zielgenauigkeit zu verstärken, könnte es Überlegenswert sein, den Berechnungen nicht nur gesamte Abschnitte des Zolldariffes zugrunde zu legen, sondern die einzelnen Kapitel (nicht aber nur Teile von diesen). Es sollte aber keine ex-Positionen innerhalb der Zolldariffkapitel geben, um das System nicht unübersichtlich werden zu lassen.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

PRODUCT CALCULATION IS A WRONG METHOD. TYPES OF PRODUCT CHANGES WITH TIME AND PREFERENCES. IT IS THE COUNTRY IN QUESTION AND NOT THE PRODUCT. PRODUCT IS THE ONE WHICH GETS THE BENEFIT FROM THE GSP AND NOT THE CRITERIA OR THE REASON FOR GSP

a business association

Belgium

Cocoa sector

We would favour graduation being calculated henceforward on the basis of product sections covering larger groups of products. Indeed current practice ensures the predictability and fairness of graduation by eliminating the effect of large and exceptional variations in the import statistics. Furthermore a change to a more detailed product grouping could potentially lead to a more complicated system and less stable & predictable environment for business in EU and GSP countries.

a business association

Belgium

International trade in flowers

For a better and simpler functioning of the GSP, graduation decisions should be based on products sections covering a larger quantity of products. The more detailed the product groupings are, the more the system will be subject to protectionist pressures and the more complicated will economic operators find the GSP to apply.

a business association

Belgium

Renewable energies

EBB contemplated the possibility to suggest a graduation of the respective countries where a mature biodiesel industry exists. In the case of Malaysian and Indonesian palm oil imports, it was relatively easy to address the competitiveness of these countries through graduation, because section III covers only vegetable oils and has only one chapter. By contrast, biodiesel falls under section VI "Products of the chemical and allied industry", containing 11 chapters. The wide scope of section VI makes it nearly impossible for the imports under the biodiesel tariff code to be reflected in the imports from section VI, which covers all chemical products. Indeed, graduation would only be possible if biodiesel exports to the EU represented more than 15% of all chemical imports to the EU coming under the GSP. Consequently, graduation is virtually inapplicable to biodiesel despite the fact that the share of imports from Argentina, Indonesia and Malaysia are far above the 15% share needed to trigger graduation. In the view of EBB, the case of biodiesel should be addressed separately from other chemicals, as the biodiesel production chain is not linked to the state of the rest of the chemical industry. EBB wishes to emphasize that graduating the whole section VI would not be the right approach to tackle biodiesel trade even in the event of biodiesel exports were sufficient to graduate the whole section, because the Argentine, Indonesian or Malaysian chemical industries are not as mature as their biodiesel sector and might need further GSP tariff preferences to develop and become competitive with the chemical industry from developed countries. These examples clearly show that graduation according to sections does not allow addressing the need for graduation for countries that have a unquestionably mature biodiesel industry and sometimes even claim it. It should be possible to "graduate" individual tariff codes.

a business association

BELGIUM

NITROGEN FERTILIZERS

NO the situation of the nitrogen fertilizer industry in chapter 31 of the CN Code is quite different from the general chemical industry. The Commission proposal should take account of specific sector situations.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

The graduation system and the grouping of products are inter-related and should be examined together. Product sections as used in the current system have the advantage to simplify the assessment and to create a "mass" effect. However, the "mass" effect can be detrimental in cases where it prevents graduation for products where GSP beneficiaries are highly competitive. It might therefore be desirable to go back to narrower groups of products.

a business association

Belgium

International trade

For a better and simpler functioning of the GSP, graduation decisions should be based on products sections covering a larger quantity of products. The more detailed the product groupings are, the more the system will be subject to protectionist pressures and the more complicated will economic operators find the GSP to apply.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance
We believe that, indeed, graduation should be refined by using a more detailed product grouping, corresponding to sectorial value chains.

a business association
Belgium
Wood products
Product selection on the base of the combined nomenclature - 8 digits.

a business association
Belgium
FESI is the EU public affairs trade association representing the sporting goods industry.
The calculation should be based on product sections taking into account publicly available data, e.g. that provided by EUROSTAT, without amendments, and taking into account data to the 6-digit tariff heading levels.

a business association
Belgium
Trade association: Man-made fibres
Graduation should be maintained as is if only to avoid fraud

a business association
Belgium
to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry
The graduation system and the grouping of products are inter-related and should be examined together. Product sections as used in the current system have the advantage to simplify the assessment and to create a "mass" effect. However, the "mass" effect can be detrimental to relevant graduation at sector level(cf. Q16). It might therefore be desirable to go back to narrower groups of products corresponding to sectorial value chains (e.g. per metal, in the non-ferrous metals industry)

a business association
Belgium
Textiles & Clothing
The basis should be the product sections. However certain countries have a dominant position in the market in specific products. In this case and whenever a country represents 20% or more of the EU Imports in a given product that product should be excluded from the GSP.

a business association
Belgium
Umbrella lobby of European commerce (retail, wholesale, international trade)
In order to simplify the GSP, graduation decisions should be based on product sections covering larger groups of products. The more detailed the product groupings are, the more the system will be subject to protectionist pressures and the more complicated will economic operators find the GSP to apply.

a business association
Belgium
Representing the foreign trade interests of European retail trade
Graduation should continue to be calculated on the basis of product sections. A more detailed product grouping would harm the handling of GSP.

a citizen
Belgium
Finance
No

a company
Belgium
Import of food items
No, because graduation and segmentation will automatically lead to even bigger disproportions and to a further deterioration of a real but correctly (= fair) working " free " market globally

a no profit organisation
Belgium
Agricultural and Agrifood Trade
The existing calculation system should be kept in its current form.

a no profit organisation
Belgium
trade
Graduation should continue as it is

a no profit organisation
Belgium
COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.
COCERAL believes that current calculations on the basis of product sections should be kept. The current system should continue to be applicable for reasons of coherence and predictability.

other
Belgium
Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)
The calculation should be based on product sections taking into account publicly available databases without amendments to the data in these data bases and taking into account data at 6-digit tariff heading levels.

other
Belgium
advising our members, interest representation ---- Cefic
No, graduation should be no longer calculated on the basis of whole sections! Already now, the level of analysis is not differentiated enough in the five major sections. Rather, individual products should be examined. Especially where chemical products are concerned, beneficiary countries frequently focus on the manufacture of only one product or a very small number of products - with these products being manufactured in very large quantities for the world market. When examining only the section according to currently applied indicators, a graduation of the section with chemical products becomes practically impossible.

a no profit organisation
Belgium, Brussels
leather sector. COTANCE represents interests of National Associations of Tanners and Dressers
Graduation should be calculated on the basis of single 6-digit HS codes.

a no profit organisation
Bolivia
Exportaciones
no deben existir mecanismos de graduación si el país está en vías de desarrollo

a no profit organisation
Bolivia
Trade and export promotion, export companies advice
Yes, The graduation mechanism should maintain its base of calculation.

a no profit organisation
Bolivia
Representación de todos los Despachantes de Aduana de Bolivia.
Cuanto más detallada sea la graduación de productos, más barreras se encontrarían al acceso de determinados productos, por lo que no debería existir modificación a las actuales bases de productos.

a no profit organisation

Bolivia
International Trade Promotion and Technical Assistance
The graduation mechanism should maintain its base of calculation

a no profit organisation
Bolivia
industry
Should be kept as it is currently.

other
BOLIVIA
EXPORTS ---- Government representative
It should be based on a more detailed product grouping, even at 10 HS digit level. This is because some developing countries have some unique special products that should require some extra support to be exported.

other
Bolivia
Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio
No debe existir mecanismo de graduación, si el país sigue siendo en vías de desarrollo

a business association
Brazil
industrial sector
Graduation should continue to be calculated on the basis of product sections, since the countries that benefit the most from GSP do not have a diversified export profile and an exclusion based on a more detailed product grouping would hinder their exports.

other
Brazil
Government ---- Ministry of External Relations - Federative Republic of Brazil
The mechanism provided by the EU GSP for excluding tariff lines of which developing countries can benefit - by Sections of products instead of tariff lines, as provided in article 14 of Regulation 732/2008 - is not justifiable.
As a result, tariff lines which are essential for the development, financial and trade needs of developing countries and which represent less than 15% of total exports of one beneficiary country to the EU may be excluded if they are part of a Section that, as a whole, surpasses such threshold. By merging numerous products of industries which present different impacts in terms of development for the beneficiary countries in one single and broad category as Sections, and by promoting, at the same time, tariff exemption for countries which benefit from the special arrangements - even if their exportations on such tariff lines exceed 15% - the EU GSP promote a negative impact on the industries of developing countries and an undesirable distortion in trade.
In particular, depending on the section in question, the country may be excluded due to a high level of exports of unprocessed products, hindering its ability to make use of GSP for more elaborated products, which is exactly the original objective of GSP. That is the case, for instance, of exports of coffee/soluble coffee and tobacco/tobacco products. The establishment of graduation by Sections does not find, moreover, parallel in the practice of other GSP systems, which graduation clauses refer to the performance of single tariff lines, as in the US GSP.

a company
Cambodia
Export
Yes, it should be.

a business association
Ecuador
Ecuadorian Exportes Federation
Los cálculos sobre la base de secciones opera adecuadamente en la actualidad.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

A mixed evaluation could be applied, with a trigger threshold for product sections and another threshold for specific products (i.e. graduation could be triggered on specific products, in which the beneficiary country exceeds 40% of the European imports under the GSP regime).

a business association

Finland

Trade Policy

Calculation of exports should be based on the real structure of total exports, instead of only exports covered by the GSP. Calculation should also be kept as easy as possible.

a business association

France

Textile

Yes the graduation should continue to be calculated on the basis of products sections.

a business association

Germany

Industry

For some sectors, graduation on the basis of whole sections is no longer adequate. The level of analysis is not differentiated enough. Additional to sections, individual products should be examined. Especially where chemical products are concerned, beneficiary countries frequently focus on the manufacture of only one product or a very small number of products - with these products being manufactured in very large quantities for the world market. When examining only the section according to currently applied indicators, a graduation of the section with chemical products becomes practically impossible.

a company

GERMANY

PHARMA/CHEMICALS

We are sharing the view that graduation should no longer be calculated on the basis of whole sections or combinations of several sections. Already now, the level of analysis is not differentiated enough in the five major sections. Rather, individual products should be examined. Especially where chemical products are concerned, beneficiary countries frequently focus on the manufacture of only one product or a very small number of products - with these products being manufactured in very large quantities for the world market. When examining only the section according to currently applied indicators, a graduation of the section with chemical products becomes practically impossible.

a company

Germany

chemical sector

No: graduation should no longer be calculated on the basis of whole sections. Already now, the level of analysis is not differentiated enough in the five major sections. Rather, individual products should be examined! Especially where chemical products are concerned, beneficiary countries frequently focus on the manufacture of only one product or a very small number of products - with these products being manufactured in very large quantities for the world market. When examining only the section according to currently applied indicators, a graduation of the section with chemical products becomes practically impossible.

a company

Germany

Think-tank for European and international economy and governance

too complex to be replied now, sorry

a company

Germany

Graduation should be calculated on the basis of customs HS chapters instead of product sections. For the automotive sector this would mean chapter 87. We don't favour a more detailed product grouping, e.g. 4-digit HS level.

a company

germany

chemical production

a more detailed product grouping makes much more sense

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

No, graduation should be no longer calculated on the basis of whole sections! Already now, the level of analysis is not differentiated enough in the five major sections. Rather, individual products should be examined. Especially where chemical products are concerned, beneficiary countries frequently focus on the manufacture of only one product or a very small number of products - with these products being manufactured in very large quantities for the world market. When examining only the section according to currently applied indicators, a graduation of the section with chemical products becomes practically impossible.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

The possibility of that this mechanism could be calculated on the basis of tariff headings should be also considered, analyzing the impacts of this possibility on the sector.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

The possibility of that this mechanism could be calculated on the basis of tariff headings should be also considered, analyzing the impacts of this possibility on the sector.

a no profit organisation

India

Research in International Economic Relations

If product specific graduation is to continue it is best done on the basis of a large group of products such as a section of the Harmonized System of Tariff Nomenclature (HS). There are at least two reasons for continuing this practice. First, taking a large group of products as the basis for product specific graduation delays graduation and allows continuity and stability in the preferential treatment for a sufficiently long period. If it were to be done on the basis of a tariff sub heading graduation and de-graduation would become very frequent and would create uncertainty in the trading regime and this would by itself have a chilling effect on trade. Second, it is more rational to act when a whole industry becomes competitive rather than an individual product line.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

More detailed product grouping IF this does not increase procedural problems and therefore compliance costs.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division
It would be preferable to base graduation on groups of more equivalent products. Graduation done separately in the subsections of textiles and clothing is a good example of more coherent product grouping.

a company
Malaysia
Manufacturing
Graduation should be calculated on the basis of product sections.

a company
Malaysia
Manufacturer
Should cover major product categories

other
Malaysia
International trade and industry ---- Ministry of International Trade and Industry Malaysia
The graduation should be calculated on the basis of detailed product grouping due to some of the products originating from beneficiary countries are quite competitive and well-perform in EU market.

other
Mauritius
International Trade ---- Government official
should be based on sector level.

a company
Myanmar
Information Supply
Yes.

other
Panamá
Servicio ---- Ministerio de Comercio e Industria de Panamá
El mecanismo de graduación que establece el reglamento actual para los beneficios del SGP y el SGP+, calculado sobre la base de secciones de productos es apropiado y debe mantenerse.

a business association
Portugal
Textile and Clothing Industry
The current Graduation thresholds as well as the reference period (3 years prior to the entry into force of the Regulation) should remain unchanged. For predictability reasons we should also retain the current time frame for graduation calculations (prior to the entry into force of the Regulation).

a company
Qatar
manufacturing
yes

a company
Qatar
Liquified Natural Gas
No comment.

a business association
Sweden
Representing the Swedish textile-, garment-, and shoe import trade

Q 17. On product sections. Detailed product grouping was introduced only to discriminate India, but not as much as China was discriminated against. See also answer to Q 16

other

Switzerland

Policy research and negotiation assistance ---- International organization

This depends on the criteria for graduation

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

Yes. Thailand suggests that graduation under the new GSP should continue to be calculated on the basis of Thai's product sections whether or not these imports account for more than 15% in value of total EU-GSP imports from all beneficiary countries in that "section" for three consecutive years i.e. calculation should be on "section" rather than "product" basis.

a citizen

UK

Economic research

Calculate using total EU imports: it is an exporter's total trade performance which is a measure of its development, not its degree of specialisation in a particular product. Over-specialisation is more likely to be a sign of lack of development.

a company

UK

Import and Distribution

more detailed product grouping

a no profit organisation

UK

Development Education, campaigns + advocacy

For reasons indicated above, graduation for a country as a whole should not be based on the performance of some sectors if this is at the expense of the least advantaged. Therefore, large group product sections should continue to be the basis, except where it can be shown that this arrangement reduces market access for the least advantaged.

a business association

United Kingdom

Seafood importation

No comment

Q18: Should the present thresholds for triggering graduation (15% or 12.5% for textiles and clothing) or statistical reference periods (most recent 3-year period before the entry into force of the Regulation) be adjusted? If so, how?

a business association

Argentina

Argentine Oil Industry Chamber

We do not consider necessary to introduce any amendments in this statistical periods. The 3 year period is the "minimum" statistical background to obtain an objective analysis in order to carry out a product graduation - inclusion.

a business association

Argentina

Argentine Biofuels Chamber

We do not consider necessary to introduce any amendments in this statistical periods. The 3 year period is the “minimum” statistical background to obtain an objective analysis in order to carry out a product graduation - inclusion.

a business association

Argentina

Rosario Board of Trade

We do not consider necessary to introduce any amendments in this statistical periods. The 3 year period is the “minimum” statistical background to obtain an objective analysis in order to carry out a product graduation - inclusion.

a business association

Argentina

Buenos Aires Grain Exchange

We do not consider necessary to introduce any amendments in this statistical periods. The 3 year period is the “minimum” statistical background to obtain an objective analysis in order to carry out a product graduation - inclusion.

a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

We do not consider necessary to introduce any amendments in this statistical periods. The 3 year period is the “minimum” statistical background to obtain an objective analysis in order to carry out a product graduation - inclusion.

a business association

Argentina

Bahia Blanca Grain Exchange

We do not consider necessary to introduce any amendments in this statistical periods. The 3 year period is the “minimum” statistical background to obtain an objective analysis in order to carry out a product graduation - inclusion.

a no profit organisation

Argentina

Export services

We do not consider necessary to introduce any amendments in this statistical periods.

a no profit organisation

Argentina

Research on international Negotiations

We do not consider necessary to introduce any amendments in this statistical periods. The 3 year period is the “minimum” statistical background to obtain an objective analysis in order to carry out a product graduation - inclusion.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Entendemos que no es necesario modificar ni el porcentaje establecido actualmente ni el período tomado como referencia. En caso de que los parámetros de graduación sean modificados, no deberían resultar más restrictivos que los actuales.

a business association

Argentine

Argentine Soybean Chain Association

We do not consider necessary to introduce any amendments in this statistical periods. The 3 year period is the “minimum” statistical background to obtain an objective analysis in order to carry out a product graduation - inclusion.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Die derzeitigen Schwellen sind ausreichend und bedürfen keiner Änderung. Die statistische Berechnungsgrundlage sollte so zeitnahe wie möglich sein, allerdings innerhalb der Geltungsdauer der jeweiligen APS-Regelung aus Gründen der Vorhersehbarkeit und Berechenbarkeit dann auch nicht mehr geändert werden.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

GRADUATION MUST BE FELT BY THE COUNTRIES OWN FIGURES. I FEEL A THREE YEARS MOVING OUT OF GSP IS GOOD . HOWEVER, THERE MUST NOT BE RISING OF THE DUTIES- IT SHOULD BE DUTY FREE OR FULL DUTY. NOTHING IN BETWEEN.

a business association

Belgium

International trade in flowers

The present thresholds for triggering graduation should be adjusted based on development criteria. Having a single threshold value is not always compatible with the objectives of the GSP, i.e. to contribute to the reduction of poverty and the promotion of sustainable development and good governance.

Therefore Union Fleurs calls for:

a) an extension of the statistical reference period to two more years (for a total of 5-year period);

b) socio-economic impact assessments of a suspension of trade preferences for specific economic sectors. Such measures will help to assess whether or not graduation should be triggered. If the impact assessment shows that, after the suspension of the GSP preferences, a given sector risks being massively hit, alternative or compensation measures should be put into place. This is particularly relevant for those sectors that highly rely on exports and for which the domestic market struggle to keep up. In addition, when formulating a graduation mechanism, more attention should be given to the protection of investments.

Uncertainties with regard to tariffs (as a result of possible graduation) may prevent EU and local entrepreneurs from further investing in infrastructures, technology or training, and makes it very difficult to secure and anticipate benefits in the long-medium term (5 to 10 years). As mentioned in question 10 the relationship between GSP beneficiaries countries' flowers suppliers and the EU importers, wholesalers and retailers is very integrated and therefore it must be taken into account that the implementation of a graduation mechanism would have a harmful impact on EU economic operators as well.

a business association

BELGIUM

NITROGEN FERTILIZERS

15% threshold is far too high in commodity business situations; just 1% volume of the EU market sold at low or dumped rates can transform a market - this was recognised in the previous GSP scheme with tariff free quota arrangements.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

No

a business association

Belgium

International trade

The present thresholds for triggering graduation should be adjusted based on development criteria. Having a single threshold value is not always compatible with the objectives of the GSP, i.e. to contribute to the reduction of poverty and the promotion of sustainable development and good governance. Therefore FRUCOM calls for: a) an extension of the

statistical reference period to two more years (for a total of 5- year period); b) socio-economic impact assessments of a suspension of trade preferences for specific economic sectors. Such measures will help to assess whether or not graduation should be triggered. If the impact assessment shows that, after the suspension of the GSP preferences, a given sector risks being massively hit alternative or compensation measures should be put into place. This is particularly relevant for those sectors that highly rely on exports and for which the domestic market struggle to keep up. In addition, when formulating a graduation mechanism, more attention should be given to the protection of investments. Uncertainties with regard to tariffs (as a result of possible graduation) may prevent EU and local entrepreneurs from further investing in infrastructures, technology or training, and makes it very difficult to secure and anticipate benefits in the long-medium term (5 to 10 years).

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

Yes, they should be adjusted by refining the product grouping. The "type" of country should also be taken into account: the lower level of development, the lower the threshold.

a business association

Belgium

Wood products

15% of the extra-EU imports threshold is too much for 1 country on its own: should be much lower. (10% maximum) Also, if a period of 3 years is taken into account, the damage is lasting 3 years before action is possible. A quicker intervention mechanism should be installed.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

The present thresholds connected with the share in GSP-covered imports are very low and they should be raised. This would reduce the likelihood of graduation coming too early for developing countries who have focused their industrial development resources on certain sectors. The problem of graduation being achieved too early would be lessened if the threshold was raised to a level of around 30%. In addition FESI believes that it is important to note that the second threshold of 50% is too high. A product section that covers more than 30% of all of a country's GSP imports into the Community can already be considered vital to that country's economy and should therefore not be graduated in accordance with the development goal that is the base for the EU's GSP policy.

It should also be noted that the use of trade defence instruments by the European Community can also have a significant and unintended impact on graduation in this respect. For example the imposition of anti-dumping duties on imports of Vietnamese leather footwear meant that it dropped below the 50% threshold as detailed in Art 13.4 of the current Regulation. It was a double blow for the developing footwear industry in Vietnam that would not have been experienced had the threshold been placed at a lower level.

Furthermore, as graduation is calculated on historic periods, it is not based upon the economic perspective or impact on trade decisions affecting the future of the sector to be graduated. (Trade measures also from other countries, if the industry sector is globally organised, Product recalls, currency exchange rates etc.) Moreover, as mentioned under question 16, the reference periods should be adaptable when trade policy measures were applied during part of this reference period.

a business association

Belgium

Trade association: Man-made fibres

No change

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

One possible way to deal with the economic dominance of certain countries among GSP beneficiaries could be to establish different thresholds for graduation depending on the global market position of a country in a specific sector or depending on its overall degree of development (e.g. the threshold level should be lower for emerging economies (if it decided to maintain them in the system) than for developing economies etc... As regards the period of reference for review, it should be the most recent 36-month period prior to adjustment considering the speed at which the global market can change.

a business association

Belgium

Textiles & Clothing

The current Graduation thresholds as well as the reference period (3 years prior to the entry into force of the Regulation) should remain unchanged. However the graduation thresholds should be linked to the overall exports of a product section of a beneficiary country and not just the ones covered by GSP.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

The current exception for textiles and clothing is motivated by protectionist considerations and should be lifted. Also for the purposes of graduation decisions, objective development criteria are needed in order to provide for the necessary coherence and acceptance of the GSP. Whatever statistical reference periods are used, they must not cast any doubts on the stability of the GSP throughout its validity.

a business association

Belgium

Representing the foreign trade interests of European retail trade

The threshold should be uniformly adjusted to 20 percent. Furthermore, objective development criteria should be applied.

a citizen

Belgium

Finance

No

a company

Belgium

Import of food items

No

a no profit organisation

Belgium

Agricultural and Agrifood Trade

No comment.

a no profit organisation

Belgium

COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

The reference period taken into account for the triggering of the graduation should be increased and should take into account eventual legislative changes. Certain food and feed safety issues may present themselves as obstacles to trade during a certain period of time while an alignment with EU requirements would cause increased export volumes. The reference volumes should be therefore analysed in a broader sense.

other

Belgium

Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)

EBCA is of the view that all sectors should be equally treated and thresholds for all, including textiles and clothing, should be set at 15 percent rather than the current 12.5 percent. The second threshold of 50 percent also causes difficulties for GSP beneficiaries and economic operators. A product sector that covers more than 30 percent of all of a country's GSP imports into the Community can already be considered as vital to that country's economy and should therefore not be graduated in accordance with the development goal that is the base for the EU's GSP policy.

other

Belgium

advising our members, interest representation ---- Cefic

The threshold for triggering graduation should be lowered to 5-10%. Statistical reference periods should be no longer than one year at most. A speedy graduation of individual products is essential.

a no profit organisation

Belgium, Brussels

leather sector. COTANCE represents interests of National Associations of Tanners and Dressers

The threshold should be unified at the current level for Textiles & Clothing! The statistical reference period should be reduced to 2 consecutive years for the sake of other developing countries getting earlier to benefit the competitive advantage.

a no profit organisation

Bolivia

Exportaciones

No

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

No

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

No debería existir ajuste.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

No

a no profit organisation

Bolivia

industry

For little countries these thresholds are ok.

other

Bolivia

Government ---- Government Official

It should be more flexible.

other

Bolivia

Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio

No

a business association

Brazil

industrial sector

The current threshold and reference periods are adequate.

other

Brazil

Government ---- Ministry of External Relations - Federative Republic of Brazil

They should be adjusted for tariff lines instead of Sections; and graduation thresholds of 15% and 12,5% should refer to total exports from all countries to the EU, not only to the total exports of beneficiary countries of the EU GSP. Total exports of beneficiary countries of the EU GSP cannot be considered a indicator of limit of competitiveness, since the benefit of the GSP itself is conceded under the requirement of presenting less-competitive conditions.

a company

Cambodia

Export

Yes, it should but in a possible level accepted by the beneficiary countries.

a business association

Ecuador

Ecuadorian Exportes Federation

Los márgenes para la graduación deberían ampliarse y asegurar que la base de cálculo no se achique con la salida del esquema de SGP de países que han firmado acuerdos comerciales preferenciales.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

The threshold for graduation should be reduced to allow countries with fewer possibilities to access the EU to enhance their share in such market, by limiting access to more competitive exporters.

a business association

Finland

Trade Policy

The current regime and the effects of changes could be examined.

a business association

France

Textile

No the current graduation thresholds as well as the reference period should remain unchanged.

a business association

Germany

Industry

The statistical reference periods should be reduced to one year to allow speedy graduation if necessary.

a company

Germany

chemical sector

The threshold for triggering graduation should be lowered to 5-10%. Statistical reference periods should be no longer than one year at most. Graduation of individual products should occur instantly.

a company

Germany

Think-tank for European and international economy and governance
to examine adjustments is always positive

a company

Germany
Yes.

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

The threshold for triggering graduation should be lowered to 5 - 10 Statistical reference periods should be no longer than one year at most. A speedy graduation of individual products is essential.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

A greater period could be also considered to ensure that the GSP has really contributed to the economic development of a country and, therefore, the increase of its exports to the EU market is not due to an occasional circumstance.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

A greater period could be also considered to ensure that the GSP has really contributed to the economic development of a country and, therefore, the increase of its exports to the EU market is not due to an occasional circumstance.

a no profit organisation

India

Research in International Economic Relations

Arguments have been given above against product specific graduation. However, if this practice is continued nevertheless, the thresholds should be reviewed on the basis of simulations of the effect that the revision will have on the developing countries. Lowering of the thresholds should certainly be avoided as it would make the GSP less useful for a greater number of developing countries. Further the other criteria for graduation which is an increase by at least 20% in quantity compared to the previous calendar year should also be reviewed since penalizing an economy for doing well might be counter to the GSP objective of augmenting the export earnings of the GSP beneficiaries.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

I do not have enough information to answer. I did not see any analysis of the effects of these policies

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

A graduation threshold would require more detailed analysis, if the principle for inclusion of countries into the list of beneficiaries is to be changed. In the current situation graduation thresholds are reasonable. On the other hand, it would be reasonable to graduate certain energy/raw material intensive products from countries rich in raw materials or energy, which apply export restrictions or dual pricing and in this way are subsidizing them. GSP shall not provide preferential access for products benefiting from of unfair competition.

a company

Malaysia

Screw, Nut & Washer
Not related to my industry

other
Malaysia
International trade and industry ---- Ministry of International Trade and Industry Malaysia
The present thresholds for triggering graduation are preferred to be maintained.

a company
Myanmar
Information Supply
No.

a company
Qatar
Liquified Natural Gas
No comment.

a business association
Spain
Fisheries
Substantial increases in the imports of fishery products should be avoided, which is what is happening nowadays with products coming from Asian countries.

a business association
Sweden
Representing the Swedish textile-, garment-, and shoe import trade
Q 18. All discrimination in the system against textile and garment and export countries of those products has to be stopped. There is no special textile trade policy in EU any more!

other
Thailand
Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce
Yes, Thailand suggests that the threshold for graduation, particularly for textiles and clothing, should be adjusted to cover all products equally at 15 per cent of total EU GSP imports from all beneficiary countries.

a company
UK
Import and Distribution
no

a business association
United Kingdom
Seafood importation
No comment

Q19: How frequently should graduation be calculated? Should de-graduation (ie the re-establishment of benefits if a beneficiary's relative share drops below the reference threshold) continue to be possible? If yes, then should there be any adjustment in how that operates?

a business association
Argentina
Argentine Oil Industry Chamber

Under the current GSP regime benefited products are only included when the Regulation is amended, considering the limited validity period of the law. Then there is no chance of adding new products once the Regulation has entered into force. Due to the fact that the current EU-GSP review process will be slower and the period of validity of the final Regulation longer, it would be highly desirable to carry out an annual revision for graduation and de-graduation but considering the last three years data. This measure will invigorate the GSP system.

a business association

Argentina

Argentine Biofuels Chamber

Under the current GSP regime benefited products are only included when the Regulation is amended, considering the limited validity period of the law. Then there is no chance of adding new products once the Regulation has entered into force. Due to the fact that the current EU-GSP review process will be slower and the period of validity of the final Regulation longer, it would be highly desirable to carry out an annual revision for graduation and de-graduation but considering the last three years data. This measure will invigorate the GSP system.

a business association

Argentina

Rosario Board of Trade

Under the current GSP regime benefited products are only included when the Regulation is amended, considering the limited validity period of the law. Then there is no chance of adding new products once the Regulation has entered into force. Due to the fact that the current EU-GSP review process will be slower and the period of validity of the final Regulation longer, it would be highly desirable to carry out an annual revision for graduation and de-graduation but considering the last three years data. This measure will invigorate the GSP system.

a business association

Argentina

Buenos Aires Grain Exchange

Under the current GSP regime benefited products are only included when the Regulation is amended, considering the limited validity period of the law. Then there is no chance of adding new products once the Regulation has entered into force. Due to the fact that the current EU-GSP review process will be slower and the period of validity of the final Regulation longer, it would be highly desirable to carry out an annual revision for graduation and de-graduation but considering the last three years data. This measure will invigorate the GSP system.

a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

Under the current GSP regime benefited products are only included when the Regulation is amended, considering the limited validity period of the law. Then there is no chance of adding new products once the Regulation has entered into force. Due to the fact that the current EU-GSP review process will be slower and the period of validity of the final Regulation longer, it would be highly desirable to carry out an annual revision for graduation and de-graduation but considering the last three years data. This measure will invigorate the GSP system.

a business association

Argentina

Bahia Blanca Grain Exchange

Under the current GSP regime benefited products are only included when the Regulation is amended, considering the limited validity period of the law. Then there is no chance of adding new products once the Regulation has entered into force. Due to the fact that the current EU-GSP review process will be slower and the period of validity of the final Regulation longer, it would be highly desirable to carry out an annual revision for graduation and de-graduation but considering the last three years data. This measure will invigorate the GSP system.

a no profit organisation

Argentina

Export services

Under the current GSP regime benefited products are only included when the Regulation is amended, considering the limited validity period of the law. Then there is no chance of adding new products once the Regulation has entered into force. Due to the fact that the current EU-GSP review process will be slower and the period of validity of the final Regulation longer, it would be highly desirable to carry out an annual revision for graduation and de-graduation but considering the last three years data. This measure will invigorate the GSP system.

a no profit organisation

Argentina

Research on international Negotiations

Under the current GSP regime benefited products are only included when the Regulation is amended, considering the limited validity period of the law. Then there is no chance of adding new products once the Regulation has entered into force. Due to the fact that the current EU-GSP review process will be slower and the period of validity of the final Regulation longer, it would be highly desirable to carry out an annual revision for graduation and de-graduation but considering the last three years data. This measure will invigorate the GSP system.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Bajo el actual régimen el mecanismo de graduación/des-graduación se aplica por el período trienal en que se encuentra vigente cada reglamento. No existe la posibilidad de re-incorporar nuevos productos una vez que la reglamentación ha entrado en vigor. En caso de que se prevea un período de aplicación de más de tres años para el nuevo reglamento, se debería considerar la posibilidad de que pueda ser revertida la graduación durante la vigencia del reglamento.

a business association

Argentine

Argentine Soybean Chain Association

Under the current GSP regime benefited products are only included when the Regulation is amended, considering the limited validity period of the law. Then there is no chance of adding new products once the Regulation has entered into force. Due to the fact that the current EU-GSP review process will be slower and the period of validity of the final Regulation longer, it would be highly desirable to carry out an annual revision for graduation and de-graduation but considering the last three years data. This measure will invigorate the GSP system.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Graduierung und De-Graduierung soll jeweils mit der gültigen APS-Verordnung festgelegt werden und dann unbedingt ohne weitere Änderungen für die Geltungsdauer dieser Regelung beibehalten werden. Die Wirtschaft muss sich auf diese stabilen Rahmenbedingungen verlassen können. Kontinuierliche Veränderungen der Rahmenbedingungen hätte mit Sicherheit eine direkte negative Auswirkung auf die Inanspruchnahme des APS.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

EVERY MONTH IT SHOULD BE NOTED BUT THE DECISIONS MUST BE DONE EVERY TWO YEARS BY THE COMMITTEE WITH ANOTHER ONE YEAR TO BE THE LAST GSP YEAR FOR THE COUNTRY.

a business association

Belgium

Cocoa sector

For the sake of stability we would prefer calculating graduation at the beginning of GSP periods.

a business association

Belgium

Renewable energies

Graduation should be calculated yearly, as the biodiesel industry evolves at a rapid pace.

a business association

BELGIUM

NITROGEN FERTILIZERS

Graduation should be automatic and calculated according to actual imports.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

Graduation should be calculated every 5 years. Countries which have suffered a severe drop in competitiveness or in economic position (for example caused by civil strife or a major environmental or other catastrophe) should be eligible to re-apply for GSP based on a clearly defined procedure. Concerned EU industries should be fully consulted during this procedure.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

Graduation/de-graduation should be evaluated on a yearly basis. It does not seem feasible to make it on a shorter period otherwise it might become untransparent and unpredictable.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

(i) Frequency of graduation In accordance with the overall strategy that underpins the EU's development policy, graduation should be predictable and allow a GSP country and its industries to prepare for graduation through timely notification. Graduation reviews that would occur at short intervals would not permit to achieve this goal. The decision on graduation should be concomitant with the review of the GSP Regulation. **(ii) De-graduation** De-graduation should indeed continue to be possible and the relevant criteria and time periods to be applied should be inserted into the GSP regulation. In the case of de-graduation it would indeed only be possible to make a calculation on the basis of the theoretical or potential GSP import figures. As mentioned above, there is no issue with using different import statistics for graduation (actual preferential imports) and de-graduation (potential preferential imports) as these are separate calculations. Given the impact of graduation on the development of the GSP beneficiary, de-graduation should occur more frequently, such as when thresholds are met in the two years following graduation. It is noted that the extension of the current GSP Regulation until 2013 distorts the de-graduation mechanism without sufficient due cause.

a business association

Belgium

Trade association: Man-made fibres

No change

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

Graduation should be calculated every 5 years and de-graduation should not be possible. Indeed, experience is showing that de-graduation is due either to exogenous factors or to the fact that graduation consists in the assessment of a "relative" position. Indeed, it has never been the case that de-graduation corresponds to the fact that a certain sector in a certain country has been regressing (i.e. would need again the support of the GSP). De-graduation is generally linked simply to the fact that the same sector in another country has progressed much more. The only case where de-graduation should be allowed would be when graduation has been triggered by the operation of distorting policies and these are lifted.

a business association

Belgium

Textiles & Clothing

For predictability reasons we should also retain the current time frame for graduation calculations (prior to the entry into force of the Regulation). Regarding De-Graduation we should adopt a longer period for reinstatement- eg 5 years.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

Graduation and de-graduation should be carried out only upon entry into force of new GSP regulations and then remain unchanged throughout the entire validity period. The continuous discussions on graduation in 2003 deprived the GSP of the indispensable predictability and legal certainty, with a clear negative impact on the utilisation rate. The stability achieved in the GSP schemes since 2005 is highly appreciated by economic operators and should be maintained in any future scheme. Stability throughout the validity period is fundamental for the well-functioning of the GSP. Likewise, it is important for the EU to refrain from renewing the scheme more often or in shorter intervals. Predictability and legal certainty are the key guiding principles to which other aspects need to be subordinated.

a business association

Belgium

Representing the foreign trade interests of European retail trade

The classification of goods should not be changed during the entire validity period.

a company

Belgium

Import of food items

Why not put higher taxation on the profit made unjustified by those companies profiting from too cheap goods ?

a no profit organisation

Belgium

Agricultural and Agrifood Trade

No comment.

a no profit organisation

Belgium

COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

The graduation system should continue to function under the current three year deadlines, while the communication on eventual changes should be made one year in advance of their entry into force.

other

Belgium

Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)

In light of the development policy that underlies the EU's GSP policy, EBCA members believe that graduation should be predictable and allow the GSP country and its industry to prepare for graduation. Graduation reviews that would occur at short intervals would not achieve this goal. The decision on graduation should coincide with the review of the GSP Regulation. Degradation should continue to be possible and objective criteria for such degradation and the relevant criteria and time periods to be applied should be inserted into the GSP regulation. In the case of degradation it would indeed only be possible to do the calculation on the basis of the theoretical or potential GSP import figures. As mentioned above, EBCA does not object to using different import statistics for graduation (actual preferential imports) and degradation (potential preferential imports) as these are separate calculations altogether. Given the impact of graduation on the development of the GSP beneficiary, degradation should occur more frequently such as when the thresholds were met in the two years following graduation. It is noted that the extension of the current GSP Regulation until 2013 distorts the degradation mechanism without sufficient due cause.

other
Belgium
Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)
Yes, this should be possible, taking account of the development goals of GSP.

other
Belgium
advising our members, interest representation ---- Cefic
Normally, graduation is made every three years - unless problems are proven to occur in concrete individual cases. In such concrete problematic cases, the graduation period should be much shorter (1 year). There should be no re-establishment of graduation. Once a product is removed from the GSP, reintegration should not be possible. The GSP is meant to encourage economic development; the scheme is not intended to assume entrepreneurial risk. As we think that the GSP and GSP+ are superfluous and counterproductive, anyway, their application should be as restricted as possible. Sustainable Development and Good Governance

a no profit organisation
Belgium, Brussels
leather sector. COTANCE represents interests of National Associations of Tanners and Dressers
Frequency: every 6 month De-graduation should not be possible!

a no profit organisation
Bolivia
Trade and export promotion, export companies advice
The current three-year period is suitable to determine the graduation of a product of the system. It should be possible the re-establishment of the benefits to products of a sector if after two consecutive years the imports into the European Union have declined and it's possible to demonstrate that it affects the beneficiary country's domestic production due to the graduation.

a no profit organisation
Bolivia
Representación de todos los Despachantes de Aduana de Bolivia.
No debe existir modificación en la forma que opera actualmente.

a no profit organisation
Bolivia
International Trade Promotion and Technical Assistance
The current three-year period is suitable to determine the graduation of a product of the system. It should be possible the re-establishment of the benefits to products of a sector if after two consecutive years the imports into the European Union have declined and it's possible to demonstrate that it affects the beneficiary country's domestic production due to the graduation

a no profit organisation
Bolivia
industry
It should be calculated every 3 years and de-graduation should be possible.

other
Bolivia
Government ---- Government Official
De-graduation should continue to be possible. What is important is to notify the country with enough time before graduation is triggered

other
Bolivia
Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio
No

a business association

Brazil

industrial sector

Graduation and de-graduation should be conducted in an annual basis. De-graduation should still be possible, since it allows the re-establishment of benefits to countries that are no longer competitive without GSP.

other

Brazil

Government ---- Ministry of External Relations - Federative Republic of Brazil

Yes, de-graduation should continue to be possible. The rationale of graduation, i.e., that a country has attained a sufficient level of competitiveness, can only be tested when the preference is withdrawn. Therefore, if, as a result of graduation, export from the graduated developing country falls, preferences should be re-established.

a company

Cambodia

Export

No comment.

a business association

Ecuador

Ecuadorian Exportes Federation

El actual proceso de graduación debe mantenerse, es decir previo a la expedición de un nuevo reglamento. Se debe seguir tomando en cuenta los datos disponibles correspondientes a los últimos tres años de importaciones bajo el amparo del SGP. Dicho proceso deberá tomar en cuenta las importaciones en precio y en volumen, para evitar distorsiones causadas por un aumento del precio internacional en alguno de los productos o secciones beneficiados con este régimen.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

The process of graduation should be maintained, until a new regulation comes in force, with the available data of imports under the GSP of the last 3 years. Such process should take into account imports (price and volume data), to avoid distortions caused by international price increases in any product or section under this regime. Finally, the graduation of a product section should be maintained as long as the pertinent Regulation is in force.

a business association

Finland

Trade Policy

The current regime and the effects of changes could be examined.

a business association

Germany

Industry

Normally, graduation is made every three years - unless problems are proven to occur in concrete individual cases. In such concrete problematic cases, the graduation period should be much shorter (1 year).

a company

Germany

chemical sector

Normally, graduation is made every three years - unless problems are proven to occur in concrete individual cases. In such concrete problematic cases, the graduation period should be much shorter (1 year).

a company

Germany

Think-tank for European and international economy and governance
annual or bi-annual basis?

a company

Germany

Provided that the duration of the GSP regulation will be extended (e.g. 5 years), we consider that a “mid-term” review (after 2,5 years) of graduation would be necessary.

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

Normally, graduation is made every three years - unless problems are proven to occur in concrete individual cases. In such concrete problematic cases, the graduation period should be much shorter (1 year). There should be no re-establishment in graduation. Once a product is removed from the GSP, reintegration should not be possible. The GSP is meant to encourage economic development; the scheme is not intended to assume entrepreneurial risk. As we think that the GSP and GSP+ are superfluous and counterproductive, anyway, their application should be as restricted as possible.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

It is necessary to provide the GSP scheme with stability. The graduation mechanism should be really effective and it should be applied when the country has really reached a level of development that allow it to be competitive without needing to have use of the preferences granted by the GSP scheme.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

It is necessary to provide the GSP scheme with stability. The graduation mechanism should be really effective and it should be applied when the country has really reached a level of development that allow it to be competitive without needing to have use of the preferences granted by the GSP scheme.

a no profit organisation

India

Research in International Economic Relations

Both graduation and de-graduation on a product-specific basis create uncertainty and are bad for the beneficiary countries. If the practice is not given up it should be applied on less frequent basis. Graduation on a product specific basis should be considered only after a sufficiently long period. It would however be fair to apply de-graduation promptly if the trade share falls below the threshold level.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

de-graduation should continue to be possible if a beneficiary does not meet anymore the requisites for the benefits.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

Graduation should be done at the moment, when the regulation is adopted. However if duration of the regulation is longer than three years, additional graduation/de-graduation could be done once during the validity of the regulation (mid-term graduation).

a company

Malaysia

Manufacturing

Calculation frequency should be every 3 years. De-graduations should be allowed

a company

Malaysia

Manufacturer

Should be at least 15 yrs

other

Malaysia

International trade and industry ---- Ministry of International Trade and Industry Malaysia

The graduation is preferred to be calculated for every three years.

other

Mauritius

International Trade ---- Government official

If there's a substantial drop below the threshold over a period of three years, derogation may be considered.

a company

Myanmar

Information Supply

six months.

other

Panamá

Servicio ---- Ministerio de Comercio e Industria de Panamá

Es apropiado que se mantenga el periodo en el cual, es calculada dicha graduación.

a company

Qatar

Liquified Natural Gas

No comment.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 19. Graduation if necessary at all should happen seldom. Not shorter intervals than 5 years.

De-graduation should be possible, but then with much shorter time-laps than graduation.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

For the sake of predictability and legal certainty, Thailand suggests that there should be no annual graduation and that the current duration of three years is appropriate. Moreover, the de-graduation should indeed remain possible for reasons of fundamental fairness.

a citizen

UK

Economic research

No reason to change any of this.

a company

UK
Import and Distribution
leave as it is now

a business association
United Kingdom
Seafood importation
No comment

Q20: Under the current Regulation benefits can be suspended in the event of "the serious and systematic violation of principles" laid down in 8 ILO core labour rights conventions and 8 UN core human rights conventions. Should any consideration be given to building on this as regards areas beyond labour and human rights such as protection of the environment and promotion of good governance? Should this provision be strengthened eg by introducing appropriate benchmarks in these areas that beneficiary countries of the standard GSP and/or EBA should also be expected to satisfy before GSP/EBA preferences are granted? What form might this take and what would be the added value in terms of promoting support for the implementation of sustainable development standards?

a business association
Argentina
Argentine Oil Industry Chamber
International Environment Agreements (Treatments, Agreements, Protocols, etc in which EU is a signatory part) mainly provide their own cooperation (cooperation funds, technical assistance, etc) and enforcement mechanisms to support developing and less developed countries in accomplishing the goals and duties established in those legal instruments. This recognizes - at a multilateral level - the precise circumstances shared by this group of countries. Then, the fact that tariff preferences would depend upon accomplishing certain multilateral settled standards might sound contradictory providing at unilateral level a different approach than that agreed in the multilateral arena. Notwithstanding that, it should be established an objective and transparent mechanisms to prove when and under which circumstances a serious and systematic violation of principles occurs.

a business association
Argentina
Argentine Biofuels Chamber
International Environment Agreements (Treatments, Agreements, Protocols, etc in which EU is a signatory part) mainly provide their own cooperation (cooperation funds, technical assistance, etc) and enforcement mechanisms to support developing and less developed countries in accomplishing the goals and duties established in those legal instruments. This recognizes - at a multilateral level - the precise circumstances shared by this group of countries. Then, the fact that tariff preferences would depend upon accomplishing certain multilateral settled standards might sound contradictory providing at unilateral level a different approach than that agreed in the multilateral arena. Notwithstanding that, it should be established an objective and transparent mechanisms to prove when and under which circumstances a serious and systematic violation of principles occurs.

a business association
Argentina
Rosario Board of Trade
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a business association

Argentina

Buenos Aires Grain Exchange

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a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

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a business association

Argentina

Bahia Blanca Grain Exchange

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a no profit organisation

Argentina

Export services

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transparent mechanisms to prove when and under which circumstances a serious and systematic violation of principles occurs as a Framework of the current regulation.

a no profit organisation

Argentina

Research on international Negotiations

International Environment Agreements (Treatments, Agreements, Protocols, etc in which EU is a signatory part) mainly provide their own cooperation (cooperation funds, technical assistance, etc) and enforcement mechanisms to support developing and less developed countries in accomplishing the goals and duties established in those legal instruments. This recognizes - at a multilateral level - the precise circumstances shared by this group of countries. Then, the fact that tariff preferences would depend upon accomplishing certain multilateral settled standards might sound contradictory providing at unilateral level a different approach than that agreed in the multilateral arena. Notwithstanding that, it should be established an objective and transparent mechanisms to prove when and under which circumstances a serious and systematic violation of principles occurs.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Vemos con preocupación que el nuevo régimen prevea supeditar el otorgamiento de las preferencias bajo SGP al cumplimiento de nuevas cuestiones que aún se encuentran en debate en una multiplicidad de foros internacionales y para las cuáles ni siquiera se han acordado parámetros mínimos. Asimismo, se considera poco conveniente relacionar las cuestiones ambientales con las de derechos humanos y laborales, ya que no se encuentra definida a nivel internacional la forma en que se vincularán estos temas. En relación con la última de las preguntas debemos destacar que no existen ESTANDARES de desarrollo sostenible acordados y consensuados a nivel internacional, con lo cual vemos con preocupación que se busque apoyar la implementación de los mismos dado el alto grado de incertidumbre que traería aparejado.

a business association

Argentine

Argentine Soybean Chain Association

International Environment Agreements (Treatments, Agreements, Protocols, etc in which EU is a signatory part) mainly provide their own cooperation (cooperation funds, technical assistance, etc) and enforcement mechanisms to support developing and less developed countries in accomplishing the goals and duties established in those legal instruments. This recognizes - at a multilateral level - the precise circumstances shared by this group of countries. Then, the fact that tariff preferences would depend upon accomplishing certain multilateral settled standards might sound contradictory providing at unilateral level a different approach than that agreed in the multilateral arena. Notwithstanding that, it should be established an objective and transparent mechanisms to prove when and under which circumstances a serious and systematic violation of principles occurs.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Wir stehen Vermischungen von Handelspolitik und anderen Politikthemen zurückhaltend gegenüber, nicht alle politischen Ziele können und sollen über die Handels- und Zollpolitik erreicht werden. Wenn allerdings nicht handelsbezogene Ziele in die Handelspolitik integriert werden, dann haben sie objektiv, klar, nachvollziehbar, nicht diskriminierend angewandt zu werden, unter der Voraussetzung, dass es international anerkannte normen, Konventionen oder Regelungen darüber gibt.

a no profit organisation

Austria

trade policy

An estimated 161 developing countries and territories currently benefit from preferences under the ordinary GSP and Everything But Arms (EBA) regimes of the GSP system. To receive these preferences they must ensure that they do not commit a “serious and systematic violation of principles” laid down in the relevant conventions (Article 15(1)). Fifteen developing countries are currently on the GSP+ component, awarding them a higher level of trade preferences than the GSP/EBA beneficiaries in return for abiding by the stricter test of “effective implementing” these and other conventions. Of the 161 GSP/EBA beneficiaries, it appears that only Burma and Belarus have ever fallen foul of the “serious and systematic violations” test, being suspended from the system respectively in 1997 and 2007, despite this group also including serial and serious violators of trade union rights including e.g. Zimbabwe and Iran.

Recognising that in many cases, the Commission might prefer to have informal dialogue with such countries rather than formally disciplining them under the GSP system, trade unions are concerned that the GSP system is not driving improvements in these countries.

A system of simple benchmarks for GSP/EBA beneficiaries should be introduced to drive improvements in a transparent, consistent and credible manner.

The first benchmark should be for GSP/EBA beneficiaries to actually ratify the relevant international conventions, over a transition period of say, five years.

Secondly, such countries should have to demonstrate, as verified by the appropriate monitoring bodies, that they do not have laws or practices that directly conflict with the core requirements of these conventions, as part of showing a basic level of compliance.

Thirdly, such countries should have to show that there is no deterioration in their levels of implementation, as a sign of genuine commitment.

Trade unions recognise that many developing countries face technical and resource barriers in implementing core conventions. Further, it is clear that as preferences under the GSP are eroded by other trade instruments, the incentives to overcome those technical barriers are further reduced. Improved and better coordinated technical assistance targeted at overcoming these barriers could be an important additional incentive under the GSP system. Such a commitment to harmonise assistance with the trading regime is already reflected in several Council and Commission declarations. The revision to the GSP regulations, along with the expanded external relations powers under the Lisbon Treaty presents an important opportunity to finally realise this.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

ENVIRONMENT, GOOD GOVERNANCE, CHILD LABOUR ETC MUST NOT CONFUSE GSP. THERE ARE MANY OTHER TOOLS FOR CORRECTING THESE FAULTS WITH ANY NATIONS. GSP MUST REMAIN SIMPLE AND CLEAN

a business association

Belgium

Renewable energies

For biofuels, the Renewable Energy Directive 2009/28 applies sustainability criteria applying to all countries, including developing countries. These criteria ensure a level-playing field between the EU industry and other countries and they are the best way to ensure biofuels sustainability. EBB recommends the extension of sustainability criteria for other sectors such as the food and feed industry, chemical industry and most importantly fossil energies.

a business association

BELGIUM

NITROGEN FERTILIZERS

Yes the ILO - human rights and environmental standards linking into GSP have proven to be workable and politically and economically significant. It is imperative that climate change commitments are introduced which encourage adherence to the international consensus and future treaty

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

For good governance, a link should be made with the Governance Action Plans operated by DG Development, where the possibility to withhold direct budget support can be an important leverage.

a business association

Belgium

representation of interests of the EU food and drink industry

GSP provisions should include appropriate benchmarks in the area of good agri-environmental practices. Such additional requirements should be considered for all three GSP regimes. Appropriate EU development assistance, depending on the type of beneficiary (EBA, GSP+ or GSP), and with the focus on those most in need (LDCs), could help developing countries to make any necessary adjustments.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance As mentioned above, more consideration should be given to the respect of the environment and health. Beside the ILO convention, those emerging economies in most cases do not respect neither the the environment nor human health. In most cases, their penetration of the EU market is the result of the so-called social and/or environmental dumping. In those conditions, giving them a preference does deeply contradict our standards and policies: could even be seen as a "sort" of incentive not to change their own standards.

a business association

Belgium

Wood products

For wood products a legal and sustainable origin of the raw material (wood) is primordial. To some extent this can be guaranteed through e.g. the use of FSC or PEFC certified material or products, or the reliance upon a FLEGT license. It should be ensured that imported goods meet the same standards and requirements as imposed on domestic (EU) products.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

For the reasons mentioned in the response to Q5 above, where possible, additional incentives should be provided to GSP countries that have invested in environmentally friendly technologies and products. For example where given benchmarks are achieved, the products concerned could be considered non-sensitive or, perhaps, higher graduation thresholds could be applied for sectors that employ environmentally friendly practices.

a business association

Belgium

Trade association: Man-made fibres

No change

a business association

Belgium

Textiles & Clothing

EU should engage in closer cooperation with developing countries by promoting capacity building actions to ensure a consistent and long-lasting achievement of the sustainable development and good governance objectives. The effective implementation of best practices should be properly monitored by the EU beforehand.

a business association

Belgium

The CEFS (Comité Européen des Fabricants de Sucre) represents all European sugar manufacturers and refiners among the European Institutions (Council of Ministers, European Commission, European Parliament, Economic and Social Committee, etc.) and among different international organisations (FAO, WTO, etc.)-Since December 2009 CEFS is registered as interest representative (Identification number in the register: 49679062863-35). .

A. Standards regarding human rights and core labour rights should be comparable with the EU standards. The ILO core standards should be effectively implemented

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

Trade policy is not a panacea. In principle, “trade and ...” issues are more appropriately addressed by the relevant specific instruments and institutions: ILO, Multilateral Environmental Agreements (MEAs) etc. However, if and when non-trade concerns are introduced into trade policy, this must be based on objective, clear and internationally well-defined conventions, laws or regulations.

a business association

Belgium

Representing the foreign trade interests of European retail trade

The criteria for suspending benefits should be unchanged.

a company

Belgium

Import of food items

Very clearly : those most important rules and regulations should be adhered to in the most strict way !

a no profit organisation

Belgium

Development NGO

GSP and EBA should not be conditioned and provided on the basis of the graduation criteria only. Only GSP+ s an incentive system should be conditions. The current conditions suffice, but monitoring of implementation should be enforced and violations must have consequences

a no profit organisation

Belgium

Agricultural and Agrifood Trade

No comment.

a no profit organisation

Belgium

Economic justice

No human rights benchmarks should be introduced for standard GSP or for EBA. Cutting especially LDCs benefiting from EBA out of the European market will only worsen the already dire economic situation of these countries and increase the plight of the population, while it is extremely unlikely it will lead to any positive development regarding the respect of human rights or other international conventions.

a no profit organisation

Belgium

trade union

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Fifteen developing countries are currently on the GSP+ component, awarding them a higher level of trade preferences than the GSP/EBA beneficiaries in return for abiding by the stricter test of “effective implementing” these and other conventions. Of the 161 GSP/EBA beneficiaries, it appears that only Burma and Belarus have ever fallen foul of the “serious and systematic violations” test, being suspended from the system respectively in 1997 and 2007, despite this group also including serial and serious violators of trade union rights including e.g. Zimbabwe and Iran.

Recognising that in many cases, the Commission might prefer to have informal dialogue with such countries rather than formally disciplining them under the GSP system, trade unions are concerned that the GSP system is not driving improvements in these countries.

A system of simple benchmarks for GSP/EBA beneficiaries should be introduced to drive improvements in a transparent, consistent and credible manner.

The first benchmark should be for GSP/EBA beneficiaries to actually ratify the relevant international conventions, over a transition period of say, five years.

Secondly, such countries should have to demonstrate, as verified by the appropriate monitoring bodies, that they do not have laws or practices that directly conflict with the core requirements of these conventions, as part of showing a basic level of compliance.

Thirdly, such countries should have to show that there is not deterioration in their levels of implementation in their levels of implementation, as a sign of genuine commitment. Trade unions recognise that many developing countries face technical and resource barriers in implementing core conventions.

Further, it is clear that as preferences under the GSP are eroded by other trade instruments, the incentives to overcome those technical barriers are further reduced. Improved and better coordinated technical assistance targeted at overcoming these barriers could be an important additional incentive under the GSP system. Such a commitment to harmonise assistance with the trading regime is already reflected in several Council and Commission declarations. The revision to the GSP regulations, along with the expanded external relations powers under the Lisbon Treaty presents an important opportunity to finally realise this.

other

Belgium

Representing working people in all sectors throughout Europe ---- European Trade Union Confederation

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other

Belgium

Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)

As already stated above, additional incentives should be provided to GSP countries that have invested in green technologies and sustainable working practices. An example of these incentives could be that certain sectors of industry would avoid graduation or be classified as non-sensitive where they contribute to environmental sustainability or other benchmarks set out in the regulation.

other

Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)

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other

Belgium

advising our members, interest representation ---- Cefic

Special incentive arrangement to encourage sustainable development and good governance (GSP+)

a no profit organisation

Bolivia

Exportaciones

El SGP es favorable para el sector empresarial de los países en desarrollo y además es importante para la generación de empleo por lo que no debe mezclarse con acciones gubernamentales que no están en el ámbito del sector empresarial.

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

No

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

Si se logra alcanzar mayores niveles de desarrollo el valor añadido estaría medido en la evolución de los indicadores de desarrollo humano y social de los países.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

No

other

Bolivia

Government ---- Government Official

Benchmarks may become a burden for beneficiary countries that will have to incur in more actions to show compliance with the requirements of the Regulation. Because every country is different and has different ways of achieving at a different pace.

other

Bolivia

Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio

El SGP es favorable para el sector empresarial de los países en desarrollo y además es importante para la generación de empleo por lo que no debe mezclarse acciones gubernamentales que no están en el ámbito del sector empresarial.

a business association

Brazil

industrial sector

Preferences granted by GSP and/or EBA cannot be suspended to ensure protection of the environment and promoting good governance. Instead of labour and human rights, which are already protected by international conventions, the benchmarks in protection of the environment and promotion of good governance are not fully agreed among all countries (there are still discussions on these subjects). The implementation of sustainable development should be guaranteed by the liberalization of additional environmental goods, such as ethanol.

other

Brazil

Government ---- Ministry of External Relations - Federative Republic of Brazil

Those are objectives of the EU external policy, which should not be tried to be attained by means of establishing them as conditions for developing countries to benefit from the GSP.

a company

Cambodia

Export

Yes, it should suspend any country that could not respect the ILO and UN conventions on Labour rights and human rights.

other

Colombia

Tourism and Trade (Import-Export) ---- Government of Colombia

With regard to the protection of the environment, there will certainly be in the near future a global initiative to counter the effect of climate change (Kyoto Protocol), leading developing countries to take initiatives to address the link between climate change and trade through the implementation of various measures such as "adjustment measures in border." If these settings are applied to GSP beneficiary countries of Latin America such as Colombia without the timely adjustment and preparation of the exportable offer, the opportunity to compete will be lost.

This would involve overrun costs in the same export operation and the exclusion of the markets, because the measures mentioned will become obstacles and covert trade restrictions.

a business association

Ecuador

Ecuadorian Exportes Federation

Los condicionamientos del SGP+ sirven para dirigir las preferencias a los países que las necesitan, en tal sentido los condicionamientos planteados por el Reglamento 732/2008 pueden mantenerse.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

The conditions set out by Regulation 732/2008 should remain valid for the GSP+. Nevertheless, some basic compromises should be extended to the standard GSP and the EBA regime, for which an evaluation mechanism on basic commitments in environmental and good governance could be implemented.

a business association

Finland

Trade Policy

Protection of environment, good governance, IPR protection, cutting trade restriction etc. would facilitate trade and investment and thus cut poverty in the beneficiary countries. The possibility of using these criteria should be examined

a company

Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.

Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products

It is good to have sustainable development and good governance criteria in place.

a business association

France

MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies

MEDEF considers that the current provisions are still valid but should be complete by a full implementation of international conventions on Governance (e.g. UN Anticorruption Convention), on Proliferation, on Intellectual Property (e.g. the WTO TRIPS) but also on the EU rules on Bribery, Money-laundering (...).

a business association

France

Textile

It's clear that before giving preferences it's important to check if these countries ratified and implemented those standards effectively.

a company

Germany

Think-tank for European and international economy and governance

yes - should be considered. If it is not taken into account in the GSP recipient countries, we suggest to make a short Communication to the European Parliament, so that the situation in these countries can be discussed publicly. Maybe an annual intrim discussion could be helpful (if these items occur)?

a company

Germany

No. The current provisions are appropriate and in our view do not need to be strengthened. We fully support the objective of the EU to safeguard human rights, labour and environmental

standards and to promote global governance. However, there are significant concerns about using trade policies to achieve these goals. We consider that for reaching environmental goals, environmental laws, and for reaching labor goals, the according laws should be used. Any mix of different policies in one instrument leads to an unpredictable and in-transparent situation.

a company
germany
chemical production

Yes definitely. The preferences shall be linked to fair working conditions for the workers in developing countries comparable to those in the EU, esp. for occupational health, safety and environmental protection as well (sustainable development).

a company
Germany
production of fine chemicals on request - toll manufacturer for fine chemicals
Yes.

a no profit organisation
Germany
trade union

It is important to give a clear signal to governments and companies based in developing countries that the EU is not tolerating violations of the main international human rights and labour standards. the introduction of benchmarks could be a good instrument. It has to be clear that every violation is sanctified immediatly. E.g. a flower producing company should lose their advantages to import flowers to Europa when it is evident that it is not respecting the ILO core conventions.

a business association
In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...
Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).
Please, see the question Q2.

a business association
In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...
Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).
Please, see the question Q2.

a no profit organisation
India
Research in International Economic Relations
We do not think that it is appropriate to make trade instruments a legitimate tool for influencing social policy in partner trading countries. The current Regulation is already unacceptable because it brings in considerations relating to labour rights and human rights. Any extension of this to include considerations relating to protection of the environment and governance would make the situation worse.

other
Italy
SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner
Yes!!!!

other
Lithuania
External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

The general arrangement of the GSP does not require ratification of the conventions, listed in the Part A of the Annex III. In practice, temporary withdrawal is only possible for those countries, which have ratified conventions in the past and now violates them. However, temporary withdrawal is practically impossible for countries, which did not ratify the above mentioned conventions, even if they are allegedly systematically violating their principles. Monitoring bodies of the conventions do not report on non-associated countries, while the Commission does not have monitoring instruments of its own. Therefore, temporary withdrawal due to violation of the conventions, listed in the Part A of the Annex III, is of the discriminatory character, while GSP benefits should be temporarily removed only on the basis of criteria, which are equally valid for all beneficiaries.

a company
Malaysia
Textile
Yes

a company
Malaysia
Manufacturing
This provision should be strengthened and allowed a more detail benchmark, or progressive improvement. Some developing or under develop countries may not able to adhere to the regulations & principles and should be assisted in achieving the standard.

a company
Malaysia
Manufacturer
yes . for eg. new penetration of the said products into the EU countries

other
Malaysia
International trade and industry ---- Ministry of International Trade and Industry Malaysia
The principle of beneficiary countries on human rights is in-line and adheres to the 8 ILO core labour rights conventions and 8 UN core human rights conventions.

other
Mauritius
International Trade ---- Government official
same rule to apply

a business association
Myanmar
Garment and Apparel Manufacturing
If there is serious violations of the rules and regulations set up by EU and ILO, GSP withdrawal must be enforced. It is morally justified. But it should be considered selectively and not collectively, because the areas that occur might be different. The people involved might be different. In Myanmar, there is no State or government involvement in the garment and apparel sector, it is all private, where estimated 90% of the workforce are women, with elementary or middle schooling education background, supporting a family of about five, as a part of the culture. Lifting the GSP sanction (which was imposed as a result of the incidence of forced labor in military circles) would not send a wrong signal. But it would be a politically, economically, morally justified. This will be the evidence of EU's efforts of promoting support for reduction of poverty and sustainable development.

a business association
Myanmar
Association
The Serious and systematic violation of human rights and labor rights are unacceptable. Forced labor is also an unacceptable practice. Since 1997, GSP was withdrawn from Myanmar because of the incidence of forced labor which was badly researched. However, this occurred in military circles, but NOT in the PRIVATE SECTOR. If there is any way that you can differentiate the two

sectors and look into it separately, this will help making the lives of the people of Myanmar a lot easier and better. Lifting the sanction would not send a wrong signal. But it would also be a politically, economically and morally justified measure by the EU, hence supporting the EU's aims of sustainable development and good governance.

a company

Myanmar

Information Supply

Labour rights are always linked to economic rights and privillages. If a country is not allowed to develop than how can it start developing its labour rights. Human rights is always linked to economic rights and development.

a business association

Paraguay

National development of the Export sector

That's right, because it pushes the governments to establish higher standards. But, if the benefits for a countrie are cutten, there shoud be the possibility that specific companies maintain their benefits once they show that THEY respect labor standards, for not punishing the good guys for the failures of the bad ones.

a company

Qatar

Liquified Natural Gas

As a general principle, we support measures to build conditions into regulations which seek to protect the environment and promote good governance, together with appropriate benchmarking. Setting such standards provides targets to aim for and enables measurement of progress.

a company

Qatar

Chemicals and Petrochemicals

Possibly, but hard to measure objectively and accurately.

a business association

Spain

Fisheries

Definitely. It is absolutely essential that beneficiary countries abide by the social and environmental conditions required to EU products and production processes.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 20.The GSP should only promote economic growth. It is as much as can be expected or even more than can be expected from the system. Any other policies should be abandoned from the system. It won't work. The notion that democracy, good governance, political freedom etc. can develop in a society without big changes, hopefully as a result of peaceful economic development, as in South-Korea, Malaysia, and before that the present OECD-countries is wrong. That development strategy has nothing to do with real life, only with European internal polities. Europe should also refrain from the notion "white mans burden" which is implied in forcing countries to apply good governance, or if we should be honest, pay lip service by signing 27 conventions they know they can not fulfil but that doesn't matter as long the country doesn't risk to come in the same kind of position as Sri Lanka has at the moment.

other

Switzerland

Policy research and negotiation assistance ---- International organization

Having benchmarks based on objective and verifiable indicators published in a timely and transparent manner, is preferred over vague criteria. We would consider (UN) conventions and codes related to business practices (investment, competition policy, corruption), which would

contribute to the objective of sustainable development through sustainable investment. An example is the United Nations Convention against Corruption

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

No. Thailand believes that no additional conditions or requirements other than those currently existing in the rules of origin should be introduced to the standard GSP under the new scheme because they will prevent Thailand from utilizing the GSP scheme.

a citizen

UK

Economic research

No, do not extend to environment: there are better ways of encouraging this. No, do not extend to GSP/EBA: not just for the same reason, but because such differentiation would be contrary to the purpose and legal structure of GSP.

a company

UK

Import and Distribution

yes. the GSP scheme should encourage processes and products that reduce the worlds' carbon footprint

a no profit organisation

UK

Development Education, campaigns + advocacy

Promoting the implementation of sustainable development standards should not be done with the stick of reduction of market access, but with the carrot of increased trade in sustainable commodities. In general, we should not seek to impose yet more conditions if these reduce market access for the least advantaged: the danger is that conditions are imposed more for the benefit of European business interests than the producers in DCs. When the gap between the annual per capita CO2 produced in Germany (9.7 tons) and that for Sudan (0.3 tons) closes somewhat, we may be in a better position to set environmental hurdles for DCs; but not yet.

other

UK

Multi sector trade union - public services, manufacturing and commercial services ---- trade union

Yes. Under the ordinary GSP and Everything But Arms (EBA) regimes of the GSP system, to receive these preferences countries must ensure that they do not commit a "serious and systematic violation of principles" laid down in the relevant conventions (Article 15(1)). GMB believes that the wording should be amended to ensure that they do not commit "any violation of principles". Given that only Burma and Belarus have ever fallen foul of this provision suggests that its enforcement is not adequate, when the group includes serial and serious violators of trade union rights including e.g. Zimbabwe and Iran. GMB is concerned that the GSP system has the bar for attainment far too low in this area, and is failing to drive improvements in these countries.

A system of simple benchmarks for GSP/EBA beneficiaries should be introduced to drive improvements in a transparent, consistent and credible manner.

The first benchmark should be for GSP/EBA beneficiaries to actually ratify the relevant international conventions, over a limited transition period.

Secondly, such countries should have to demonstrate, as verified by the appropriate monitoring bodies, that they do not have any laws or practices that directly conflict with the core requirements of these conventions, as part of showing a basic level of compliance.

Thirdly, such countries should have to show, on a regular basis that there is no deterioration in their levels of implementation. GMB recognises that sometimes developing countries face technical and resource barriers in implementing core conventions, and the EU Commission needs to address this in terms of building in positive support/capacity building measures to assist compliance and enforcement.

Improved and better coordinated technical assistance targeted at overcoming these barriers could be an important additional incentive under the GSP system. Such a commitment to harmonise assistance with the trading regime is already reflected in several Council and Commission declarations. The revision to the GSP regulations, along with the expanded external relations powers under the Lisbon Treaty, working in co-operation with Development policy, presents an important opportunity to finally realise this.

a business association
United Kingdom
Seafood importation
No comment

a no profit organisation
United Kingdom
Representing workers in all sectors in the UK

An estimated 161 developing countries and territories currently benefit from preferences under the ordinary GSP and Everything But Arms (EBA) regimes of the GSP system. To receive these preferences they must ensure that they do not commit a "serious and systematic violation of principles" laid down in the relevant conventions (Article 15(1)).

Fifteen developing countries are currently on the GSP+ component, awarding them a higher level of trade preferences than the GSP/EBA beneficiaries in return for abiding by the stricter test of "effectively implementing" these and other conventions. Of the 161 GSP/EBA beneficiaries, it appears that only Burma and Belarus have ever fallen foul of the "serious and systematic violations" test, being suspended from the system respectively in 1997 and 2007, despite this group also including serial and serious violators of trade union rights including e.g. Zimbabwe and Iran. Recognising that in many cases, the Commission might prefer to have informal dialogue with such countries rather than formally disciplining them under the GSP system, trade unions are concerned that the GSP system is not driving improvements in these countries.

A system of simple benchmarks for GSP/EBA beneficiaries should be introduced to drive improvements in a transparent, consistent and credible manner.

The first benchmark should be for GSP/EBA beneficiaries to actually ratify the relevant international conventions, over a transition period of, say, five years.

Secondly, such countries should have to demonstrate, as verified by the appropriate monitoring bodies, that they do not have laws or practices that directly conflict with the core requirements of these conventions, as part of showing a basic level of compliance.

Thirdly, such countries should have to show that there is not deterioration in their levels of implementation as a sign of genuine commitment. Trade unions recognise that many developing countries face technical and resource barriers in implementing core conventions.

Further, it is clear that as preferences under the GSP are eroded by other trade instruments, the incentives to overcome those technical barriers are further reduced. Improved and better coordinated technical assistance targeted at overcoming these barriers could be an important additional incentive under the GSP system. Such a commitment to harmonise assistance with the trading regime is already reflected in several Council and Commission declarations. The revision to the GSP regulations, along with the expanded external relations powers under the Lisbon Treaty presents an important opportunity to finally realise this.

a company
Uruguay
Exportacion de Miel , Cera y Propoleos organico y convencional
Hay que apoyar de alguna manera mas solida la proteccion del medio ambiente favoreciendo mas , por ejemplo , los productos organicos

Q21: Should the product coverage (in 2009 - 6336 tariff lines) and associated tariff treatment (currently very largely but not exclusively duty-free) under GSP+ be reviewed? If so, how?

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Allgemeine Bemerkung: Das APS+ unterstützt „verletzbare“ (unterentwickelte) Länder , die gleichzeitig zu ernsthaften Anstrengungen bereit sind, international akkordierte Sozialregelungen (Good Governance & Sustainable Development) zu ratifizieren und umzusetzen. Wenngleich die Zielsetzung zu unterstützen ist, zeigen sich in der Praxis Probleme bei der Sicherstellung der tatsächlichen Erfüllung der geforderten Kriterien durch das antragstellende Land. Es besteht die immense Gefahr von politisch motivierten Vorgangsweisen, die es zu vermeiden gilt. Das APS+ darf kein politisches Instrument werden; es ist in Zukunft vermehrt - vor Gewährung der APS+-Präferenzen - zu prüfen, dass eine effektive Umsetzung der geforderten Bedingungen vorliegt oder ernsthaft in die Wege geleitet wurde. Eine effektive Kontrolle der Einhaltung der Verpflichtungen nach APS+-Gewährung, verbunden mit Sanktionen bei nachgewiesenem Verstoß, sollte außer Streit stehen. Die Verletzbarkeitsschwelle (1%) sollte unverändert bleiben, ebenso sehen wir keine Notwendigkeiten zu Änderungen der erfassten Warenbereiche

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

I PREFER NOT TO WORK ON PRODUCT LINES AS IT MAKES COUNTRIES COMPETE AGAINST EACH OTHER EVEN WITHIN EU AND OF COURSE IN THE POOR COUNTRIES. NEW THOUGHTS SHOULD COME IN AND LET US GET OUT OF THIS LOBBYING CULTURE WHICH DISTORTS EVERYTHING.

a business association

Belgium

International trade in flowers

We believe that, as a principle, all products covered by GSP+ shall be granted duty-free access to the EU market.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

No, otherwise this might affect the delicate balance between EBA, GSP+ and GSP.

a business association

Belgium

International trade

We believe that all products covered by GSP+ shall be granted duty-free access to the EU market. Therefore exceptions such as the case of shrimps of CN code 0306 13, on which of duty of 3.6% applies under GSP+, should be suppressed.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

Yes, should be reviewed according to the comments made under item 20.

a business association

Belgium

Trade association: Man-made fibres

No

a business association

Belgium

Textiles & Clothing

As said before in cases where a country benefiting from GSP+ has a dominant position in the market and is responsible for at least 20% of the Imports in a given product that product should be excluded from GSP or at least be subject to the general GSP.

a business association

Belgium

EUROCHAMBRES, the Brussels-based Association of European Chambers of Commerce and Industry EUROCHAMBRES is the sole European body that serves the interests of every sector and every size of European business and the only one so close to business. EUROCHAMBRES has member organizations in 45 countries representing a network of 1,700 regional and local Chambers with over 19.8 million member companies. Chamber members employ over 120 million employees.

Yes. We believe that the system should be broaden to more products, to services and that It should be based on objective development criteria and not be based on sensitive or not sensitive products for the EU industry.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

General remarks: With preference erosion progressively undermining the attractiveness of preferential regimes, the GSP 2012 should state a bold incentive to its users by offering sound liberalisation of trade with its beneficiary countries. Country coverage: Selection criteria need to be based on objective development criteria (e.g. GDP per capita), not on sensitivity (e.g. import threshold) Product coverage: - No sectoral or product-specific exclusions - There is still considerable scope in eliminating specific duties in the agricultural and processed sector. - Textiles and footwear should be integrated into the normal preferential offer. - No more distinction between sensitive and non-sensitive products

a business association

Belgium

Representing the foreign trade interests of European retail trade

The product coverage concerned should be extended especially in the agricultural sector.

a citizen

Belgium

Finance

No

a company

Belgium

Import of food items

Simplify it to the maximum ! In order to prevent aberrations and loopholes for " smart companies and people " ...

a no profit organisation

Belgium

Agricultural and Agrifood Trade

No comment.

a no profit organisation

Belgium

trade

NO

other

Belgium

advising our members, interest representation ---- Cefic

s. Position Q 1.

a no profit organisation

Bolivia

Exportaciones

Se puede mejorar con la inclusión de otros productos

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

The current products benefit should be kept and add the benefits granted to countries in the EBA regime for agricultural products. In other words, consolidate both benefits into a single system.

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

Podrían incluirse mayor número de productos en la lista de preferencias, considerando la potencialidad exportadora boliviana y su evolución.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

The current products benefit should be kept and add the benefits granted to countries in the EBA regime for agricultural products. In other words, consolidate both benefits into a single system

a no profit organisation

Bolivia

industry

yes, it should include all the products.

other

Bolivia

Government ---- Government Official

No

other

Bolivia

Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio

Se puede mejorar con la inclusión de otros productos

a company

Cambodia

Export

No comment.

other

Colombia

Tourism and Trade (Import-Export) ---- Government of Colombia

Colombia considers that the GSP Plus should extend tariff benefits covering specific tariff and any other no ad-valorem tariff, including quotas.

a business association

Ecuador

Ecuadorian Exportes Federation

Si debería revisarse el ámbito ampliándolo como un incentivo a los esfuerzos realizados por los países beneficiarios del SGP+ en la aplicación y defensa de los derechos humanos, derechos laborales, medio ambiente y buena gobernanza. El tratamiento arancelario también debería mejorar incorporando inclusive un tratamiento preferencial en lo referente a barreras para-arancelarias, por ejemplo a los Novel Foods. La facilitación de cooperación técnica y económica a los operadores y exportadores debe ser tenido en cuenta al diseñar programas y proyectos de beneficio de los países que cumplen con todos los requisitos del SGP+.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

As an incentive to the efforts made by the beneficiary countries of the GSP+ in the enforcement and defense of human rights, labour rights, environment and good governance, the product coverage of the scheme should be deepened, as well as the tariff treatment granted to them. It is also of utmost importance to include the treatment of non tariff barriers and the non reimbursable economic and technical co-operation, as it has been stated in the answers to questions 2 a), 2 c), 3, 4 and 5.

a business association

Finland

Trade Policy

The product coverage may be examined and results may lead to a review.

a company

Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.

Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products

Yes. As regards wood products, the global situation on the wood products markets has changed and some GSP-imports are threatening the EU industries while the respective countries keep high barriers to their markets.

a business association

France

Textile

No because with the graduation system the competitive countries should be excluded.

a business association

Germany

Industry

s. response to Q 1

a company

Germany

Think-tank for European and international economy and governance

if countries improve their sustainability, environment performance etc. as well as governance, I propose so. See also Q 20.

a company

Germany

Like in GSP, in principle all product lines should be covered (see also question 10).

a company

germany

chemical production

yes, and verify if it generates a global advantage (carbon footprint)

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

s. Position Q 1.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).
From the perspective of the processing and trading sector of fisheries and aquaculture products, the current product coverage for the fisheries and aquaculture products is positive.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

From the perspective of the processing and trading sector of fisheries and aquaculture products, the current product coverage for the fisheries and aquaculture products is positive.

a no profit organisation

India

Research in International Economic Relations

As stated above the use of a trade instrument like tariff preference to influence social policy is inappropriate. This component of the EU GSP should be phased out

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

Probably too many tariff lines. They should be grouped for the sake of simplification....

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

No, the list of products should not be changed - it is already very generous.

a company

Malaysia

Export Pepper

Nil

a company

Malaysia

Screw, Nut & Washer

Not related to my industry

a company

Malaysia

Manufacturing

yes.

other

Mauritius

International Trade ---- Government official

No

a company

Myanmar

Information Supply

No

other

Panamá

Servicio ---- Ministerio de Comercio e Industria de Panamá

Las 6336 líneas arancelarias que cubre el SGP+ deben ser revisadas para que todas tengan un tratamiento de libre arancel.

a business association

Paraguay

National development of the Export sector

It would be a great deal for Paraguay to include cane sugar (or just organic sugar which not competes with EU sugar producers. Therefore, the EU could create an own tariff line for organic and/or integral sugar)

a company

Qatar

Liquified Natural Gas

No comment.

a business association

Sweden

The Association of Swedish Chambers of Commerce representing Swedish companies. The Swedish Chambers of Commerce are regional, independent, non-profit making organizations, funded by the members.

Yes. We believe that the system should be broaden to more products, to services and that It should be based on objective development criteria and not be based on sensitive or not sensitive products for the EU industry.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 21. All products should be included.

other

Switzerland

Policy research and negotiation assistance ---- International organization

First of all, we are not sure how the 6,336 tariff lines compare with the total number of tariff lines in the EU nomenclature (which supposedly is under constant review). In any case, we doubt the need to include products with zero or very low (below 1%) MFN duty. In the current GSP(+) system, this has been done rather arbitrarily. For instance, rubber has been included and guaves/mangos have been included.. We prefer a simple rule on inclusion of tariff lines with a zero or very low MFN rate.

other

Syrian Arab Republic

Customs ---- Government sector

I would prefer to make a specific studies by the specialists (textile exports, agricultural ..) To give an answer which would based on the real trade situation, in the way you find it convenient

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

N/A

a citizen

UK

Economic research

Extend if possible, but give at least one year's notice because this will disadvantage other, GSP only, exporters

a company

UK

Import and Distribution

no

a no profit organisation

UK

Development Education, campaigns + advocacy

Given that one of the stated aims of GSP+ is to encourage diversification, the product range should be expanded as much as possible, and given duty free access.

a business association

United Kingdom

Seafood importation

No comment

a company

Uruguay

Exportacion de Miel , Cera y Propoleos organico y convencional

Los productos organicos deben tener consideraciçon especial .

Q22: Should graduation continue to apply to GSP+ beneficiaries? If yes, should the mechanism apply any differently to them than in the case of beneficiaries of the standard GSP?

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Keine Änderung notwendig

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

AS EXPLAINED I PREFER TO HAVE ONLY TWO CLASSES - GSP COUNTRIES OR NON GSP COUNTRIES . SIPLE EG EU COUNTRIES AND NON EU COUNTRIES. NO RULES ARE PERFECT BUT RULES MUST BE IMPLEMENTABLE TO GET BETTER RESULTS.

a business association

Belgium

International trade in flowers

The application of a graduation mechanism for GSP+ beneficiary countries should be lifted, as long as those countries continue to fully comply with the set criteria of vulnerability and compliance with a number of international conventions. By definition, the EU must encourage an active participation of GSP+ beneficiary countries, which are amongst the most vulnerable, in international trade and this can only be done by securing a stable preferential market access for these countries for a given period of time, therefore enabling visibility and predictability of export activities and investments in the medium to long-term.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

Yes, it should continue to apply and in the same manner.

a business association

Belgium

representation of interests of the EU food and drink industry

Alternatively to the answer provided to the question 20, this good agri-environmental practice requirement could be introduced at least within the scope of the GSP+ regime.

a business association

Belgium

International trade

The application of a graduation mechanism for GSP+ beneficiary countries should be lifted, as long as those countries continue to fully comply with the set criteria of vulnerability and compliance with a number of international conventions. By definition, the EU must encourage an active participation of GSP+ beneficiary countries, which are amongst the most vulnerable, in international trade and this can only be done by securing a stable preferential market access for these countries for a given period of time, therefore enabling visibility and predictability of export activities and investments in the medium to long-term.

While supporting the elimination of the graduation mechanism, FRUCOM believes that the preferential arrangements withdrawal for infringement of the 27 international conventions should continue to apply, as a key to ensure sustainable development and good governance in these countries.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

It does make sense to apply graduation to these countries because one would expect that by closing the gaps between their standards and ours, the need for tariff incentives is no longer justified.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

We believe that graduation does not offer any advantages or benefits to GSP+ beneficiaries; it should be removed.

a business association

Belgium

Trade association: Man-made fibres

Yes

a business association

Belgium

Textiles & Clothing

We should continue to apply graduation and as defended for the general GSP we should enlarge the criteria and include other elements (raw materials, trade facilitation measures, protection and enforcement of IP Rights, FDI safeguard) which could be considered for graduation purposes even in cases where the thresholds for triggering graduation are not met

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

By definition, GSP+ beneficiaries are the core of the group of countries whose exports the scheme is supposed to encourage. Therefore, the entire GSP+ should be exempted from graduation.

a business association

Belgium

Representing the foreign trade interests of European retail trade

Graduation should not be applied to GSP+ beneficiaries.

a citizen

Belgium

Finance

No

a company

Belgium

Import of food items

Above was stated : no discrimination should be allowed ...???

a no profit organisation

Belgium

Development NGO

graduation should apply bt GSP+countries should get better market access than GSP countries with the same graduation level

a no profit organisation

Belgium

Agricultural and Agrifood Trade

The application of a graduation mechanism for GSP+ beneficiary countries should be raised, as long as those countries continue to fully comply with the set criteria of vulnerability and compliance with a number of international conventions. By definition, the EU must encourage an active participation of GSP+ beneficiary countries, which are amongst the most vulnerable, in international trade and this can only be achieved by securing a stable preferential market access for these countries for a given period of time, therefore enabling visibility and predictability of export activities and investments in the medium to long-term. While supporting the elimination of the graduation mechanism, we believe that the preferential arrangements withdrawal for infringement of the 27 international conventions should continue to apply, as a key to ensure sustainable development and good governance in these countries.

a no profit organisation

Belgium

trade

NO

a no profit organisation

Bolivia

Exportaciones

No

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

It is not necessary to change this aspect.

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

No debería existir diferencia en la graduación aplicada a ambos esquemas.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

It is not necessary to amend this aspect

a no profit organisation

Bolivia

industry

No

other

Bolivia

Government ---- Government Official

No graduation better, if graduation enough notification and predictability.

other

Bolivia

Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio
No

a company
Cambodia
Export

No, it should not be in a serious situation. The new mechanism is to conduct investigation more details and give a warning before the measure be taken.

other
Colombia

Tourism and Trade (Import-Export) ---- Government of Colombia

Colombia considers that graduation should not apply to GSP + beneficiary countries or the EBA countries because when efforts are made to promote certain productions in order to take advantage of the scheme and when exports are made or existing exports increased, punishment such as the graduation is not suitable.

a business association
Ecuador
Ecuadorian Exportes Federation

Preferiblemente el mecanismo de graduación no debería ser aplicado a los países beneficiarios del SGP+ en la medida que los mismos están cumpliendo con altos requerimientos de implementación de convenciones internacionales, sobre todo si estos requisitos adicionales no les son solicitados a los beneficiarios del SGP estándar y del régimen Todos Menos Armas.

other
Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

The graduation mechanism should not apply to the beneficiaries of GSP+ since they are already complying with high requirements on the implementation of international conventions that are not requested to the beneficiaries of standard GSP and the EBA regime.

a business association
Finland
Trade Policy
Yes.

a business association
France
Textile
The mechanisms should be the same.

a company
Germany
Think-tank for European and international economy and governance
1st Q: yes, 2nd: the EU should apply "goodies" for well governed countries

a company
Germany
Yes.

a business association
In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...
Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).
The current beneficiary countries of the GSP+ should continue to be it in the successor regulation. Thus, the graduation mechanism for the GSP+ beneficiaries should be applied differently to them than in the case of beneficiaries of the standard GSP, because in the case of

the GSP+ its beneficiaries are vulnerable countries, therefore, needed of the tariff preferences granted by this regime. If applied, transitional period should be established to guarantee the interests of the current beneficiary countries, EU importers and internationalised European companies.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

The current beneficiary countries of the GSP+ should continue to be it in the successor regulation. Thus, the graduation mechanism for the GSP+ beneficiaries should be applied differently to them than in the case of beneficiaries of the standard GSP, because in the case of the GSP+ its beneficiaries are vulnerable countries, therefore, needed of the tariff preferences granted by this regime. If applied, transitional period should be established to guarantee the interests of the current beneficiary countries, EU importers and internationalised European companies.

a no profit organisation

India

Research in International Economic Relations

No comments in view of the general response to Q21, challenging the appropriateness of this component of EU GSP.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

Yes, graduation should apply on equal basis as for the general arrangement.

a company

Malaysia

Textile

No

a company

Malaysia

Export Pepper

No comments

a company

Malaysia

Manufacturing

yes

other

Mauritius

International Trade ---- Government official

Graduation should be lower including shorter time period.

a company

Myanmar

Information Supply

Yes

other

Panamá

Servicio ---- Ministerio de Comercio e Industria de Panamá

La graduación aplicada tanto al SGP General como al SGP+ debe continuar siendo aplicada según el Reglamento actual.

a company
Qatar
Liquified Natural Gas
No comment.

a business association
Sweden
Representing the Swedish textile-, garment-, and shoe import trade
Q 22. We suggest that no graduation should take place during a GSP-period of 5 years. In the change from one period to the next a graduation can be done. We do not see this as eternal, we expect all duties will go as a result of unilateral decision by EU as soon as bilateral- and plurilateral free trade agreements have been negotiated between EU and US, Canada (and including Mexico), EU-China and EU- Japan. .We do not expect GSP to be in place more than maximum 10 more years. We do not see any reason what so ever for duties any more exept negotiate them to 0 in free trade negotiations the ones we just suggested. Graduation becomes a small question in that perspective.

other
Thailand
Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce
N/A

a citizen
UK
Economic research
Same criterion, but see Q16 on criteria.

a company
UK
Import and Distribution
yes and no

a no profit organisation
UK
Development Education, campaigns + advocacy
Given that GSP+ countries are, by definition, vulnerable, a longer period should be afforded to ensure they do not slip back as soon as status is removed.

a business association
United Kingdom
Seafood importation
No comment

Q23: Should the list of 27 conventions relevant for GSP+ (those which GSP countries must ratify and effectively implement) be adjusted in any way? If so, for what purpose and how (eg additions, updatings, deletions)?

a business association
Austria
representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Keine Änderungen bei der Auflistung der einzuhaltenden Konventionen erforderlich; wesentlich ist allerdings die frei von politischer Motivation erfolgende effektive Vorab-Überprüfung und laufende ex post-Kontrolle (siehe Antwort zu Frage 21)

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

THESE CREAE SERIOUS LBBYING AND IF TIME LIMITS ARE NOT FOLLOWED MANY CASES ETC. I WOULD MAKE CLEAR DATES FOR REVIEWING THE ELIGIBILITY BY THE COMMITTEE AND ONE YEARS NOTICE TO GO OUT OF GSP BY THE COMMITTEE. TIME HAS COME FOR US TO MAKE IT SIMPLE AND USEFUL. TODAY IT HAS BECOME A GAME FOR THE ECONOMISTS AND LOBBYISTS- OF COURSE ALSO A SOURCE OF EARNING AT THE POOR COUNTRIES EXPENSE

a business association

Belgium

International trade in flowers

The experience of the current GSP has shown that the procedures for identification of the GSP+ beneficiaries delay the process to an extent that diminishes the predictability and, hence, the effectiveness of the GSP+.

Union Fleurs fully supports the aims underlying the 27 conventions, but the intended effect of the GSP+ will only be achieved if EU importers and exporting developing countries know the list of GSP + beneficiary countries and products well in advance, instead of e.g. the three weeks between 12 December 2008 (when the beneficiary countries were published) and 1 January 2009 (when the GSP entered into force).

When preparing the next GSP regulation, we insist that operators be informed of the new conditions applicable at least one year before their entry into force in order to allow them to adjust their level of costs and planning of contracts. To secure and therewith promote investments in these countries should be considered as an objective of utmost importance.

In addition, Union Fleurs believes that specific sectoral developments in terms of environmental and social conditions, such as the ones specifically developed by the floricultural sector in Latin American and East African countries, should also be adequately recognised and taken into account within the criteria of the new GSP+ - and not only the ratification and implementation of international conventions by developing countries.

As an example, we can mention some environmental and social programs that have been specifically developed by the floricultural industry in Colombia and should be recognised for their contribution to the improvement of environmental and social conditions: "Florverde" created to promote respect for and conservation of Colombia's natural resources; "Cultivate Peace in the Family" a conflict resolution program within the family for all its workers; "Flowers are home" aimed at providing subsidies in the acquisition of new housing, improvement of existing houses and support in land title issues.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

Yes. The UN Anti-corruption convention should be added, to strengthen the contribution of the GSP+ to good governance. The GSP+ should also incorporate efforts by beneficiary countries to protect intellectual property rights. The EU could provide further assistance for the monitoring and enforcement of IPR rules.

a business association

Belgium

representation of interests of the EU food and drink industry

Alternatively to the answer provided to the question 20, this good agri-environmental practice requirement could be introduced at least within the scope of the GSP+ regime.

a business association

Belgium

International trade

The experience of the current GSP has shown that the procedures for identification of the GSP+ beneficiaries delay the process to an extent that diminishes the predictability and, hence, the

effectiveness of the GSP+. FRUCOM fully supports the aims underlying the 27 conventions, but the intended effect of the GSP+ will only be achieved if importers know the list of beneficiary countries and products as well as the respective import tariffs well in advance, instead of e.g. the three weeks between 12 December 2008 (when the beneficiary countries were published) and 1 January 2009 (when the GSP entered into force). When preparing the next GSP regulation, we insist that operators be informed of the new conditions applicable at least one year before their entry into force in order to allow them to adjust their level of costs and planning of contracts. To secure and therewith promote investments in these countries should be considered as an objective of utmost importance.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance
As mentioned above, non compliance with internationally recognised environmental targets should be a concern. We have particularly in mind the ETS Directive and the commitments taken by the EU (20% and even 30% reduction of CO2 emissions) which create distortions of competition with these emerging economies.

a business association

Belgium

Trade association: Man-made fibres

Additions see Q20

a business association

Belgium

Textiles & Clothing

At least they should be updated.

a business association

Belgium

The CEFS (Comité Européen des Fabricants de Sucre) represents all European sugar manufacturers and refiners among the European Institutions (Council of Ministers, European Commission, European Parliament, Economic and Social Committee, etc.) and among different international organisations (FAO, WTO, etc.)-Since December 2009 CEFS is registered as interest representative (Identification number in the register: 49679062863-35). .

A. : Yes, once new international agreements are adopted regarding climate change these should be incorporated to the current list. If by the expiration date of the current GSP Regulation (31.12.2011) no foreseeable agreement is already in place at international level, the EU should unilaterally establish a set of additional minimum standards to make sure that countries have put in place appropriate measures to control and curb Greenhouse Gas emissions.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

The experience of the current GSP has shown that the procedures for identification of the GSP+ beneficiaries delay the process to an extent that diminishes the predictability and, hence, the effectiveness of the GSP+. EuroCommerce fully supports the aims underlying the 27 conventions, but the intended effect of the GSP+ will only be achieved if importers know the list of beneficiary countries and products as well as the respective import tariffs one year in advance, instead of e.g. the three weeks between 12 December 2008 (when the beneficiary countries were published) and 1 January 2009 (when the GSP entered into force). When preparing the next GSP regulation, the Commission will therefore be well-advised to reconcile the list of conventions with the practical need to provide clarity at an early stage.

a business association

Belgium

Representing the foreign trade interests of European retail trade

The list of 27 conventions relevant for GSP+ is very ambitious. Efforts for implementing conventions of less importance until a fixed date should be also accepted.

a citizen
Belgium
Finance
No

a company
Belgium
Import of food items
No clear idea

a no profit organisation
Belgium
Agricultural and Agrifood Trade
No comment.

a no profit organisation
Belgium
trade
NO

other
Belgium
Representing working people in all sectors throughout Europe ---- European Trade Union Confederation
There certainly should be no deletions. In addition the core labour standards, there are other important ILO conventions relevant to decent work that should be considered for inclusion. These include those identified as "priority conventions" by the ILO Governing Body in its 1993 decision (Convention 122 on Employment Policy, Conventions 81 and 129 on Labour Inspection and Convention 144 on Tripartite Consultation), other Conventions enjoying widespread support at the ILO (including Convention 155 on Occupational Safety and Health, Convention 102 on Social Security, Convention 103 on Maternity Protection, and Convention 135 on Workers' Representatives), and certain other essential ILO instruments (namely the Promotion of Cooperatives Recommendation, 2002 (No. 193), the Human Resources Development Recommendation, 2004 (No. 195) and the Employment Relationship Recommendation, 2006 (No. 198)).
Additional ILO Conventions dealing specifically with occupational health and safety issues that should be included are Convention 162 on Safety in the Use of Asbestos, as well as others concerning sectors which are recognized as hazardous by the ILO, and Convention 187 on the Promotional Framework for Occupational Safety and Health.

other
Belgium
Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)
There certainly should be no deletions. In addition the core labour standards, there are other important ILO conventions relevant to decent work that should be considered for inclusion. These include those identified as "priority conventions" by the ILO Governing Body in its 1993 decision (Convention 122 on Employment Policy, Conventions 81 and 129 on Labour Inspection and Convention 144 on Tripartite Consultation), other Conventions enjoying widespread support at the ILO (including Convention 155 on Occupational Safety and Health, Convention 102 on Social Security, Convention 103 on Maternity Protection, and Convention 135 on Workers' Representatives), and certain other essential ILO instruments (namely the Promotion of Cooperatives Recommendation, 2002 (No. 193), the Human Resources Development Recommendation, 2004 (No. 195) and the Employment Relationship Recommendation, 2006 (No. 198)).
Additional ILO Conventions dealing specifically with occupational health and safety issues that should be included are Convention 162 on Safety in the Use of Asbestos, as well as others concerning sectors which are recognized as hazardous by the ILO, and Convention 187 on the Promotional Framework for Occupational Safety and Health.

a no profit organisation

Bolivia
Exportaciones
No se deben mezclar temas comerciales con otros temas no vinculados al ambito productivo exportador

a no profit organisation
Bolivia
Trade and export promotion, export companies advice
No

a no profit organisation
Bolivia
Representación de todos los Despachantes de Aduana de Bolivia.
No debería existir ajuste en la lista de convenios a ser firmados para ser beneficiario del SGP.

a no profit organisation
Bolivia
International Trade Promotion and Technical Assistance
No

a no profit organisation
Bolivia
industry
It should be reduced to the main conventions.

other
Bolivia
Government ---- Government Official
No adjustments. Perhaps deleting the one about Apartheid, because it is no longer relevant

other
Bolivia
Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio
Consideramos que no se deben mezclar temas comerciales con otros temas no vinculado al ámbito productivo y exportador.

a company
Cambodia
Export
No comment.

a business association
Ecuador
Ecuadorian Exportes Federation
Se debe mantener la lista en los términos actuales. Estos países ya han hecho un esfuerzo grande para ratificar y aplicar efectivamente esas convenciones.

other
Ecuador
Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador
The list should remain the same as it is right now, because it is already a heavy burden for the beneficiaries.

a business association
France
MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies
EU conventions should also be included such as the GRECO Anticorruption convention. EU should help GSP+ countries to implement these regulations through training programs and

technical assistance, in co-operation with the WTO (Aid for Trade) or with the OECD (The Paris-based organization has its own training program for anti-bribery). EU business could also provide assistance and share experience to its counterparts with best practices and trainings.

a business association

France

Textile

This point was modified in 2006. These conventions and declaration have acknowledged the link between development and the respect of basic human and labour rights. It's appropriate to address these special development needs positively through granting additional GSP preferences to those developing countries which have taken on board the major international conventions in these areas.

a business association

Germany

Industry

The conditions for granting GSP+ should also include ratification and implementation of international agreements on protection of intellectual property and on public procurement and encompass dismantling of export restrictions on raw materials. In the long term, the cohort of favoured countries should be limited to least developed countries and only the simple system of "everything but arms" should still apply.

a company

Germany

Think-tank for European and international economy and governance

27 is quite high - isn't there a simplification possible? Are there any products where the customs revenues are so low that they don't play a major role?

a company

Germany

No.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

The processing and trading sector of fisheries and aquaculture products has always advocated of promoting the principles of sustainable fishing & trade from the perspective of social and environmental aspects in a world level, as well as, the hygienic-sanitary standards. Because of this, the ratification and implementation of all these conventions is considered positive. Therefore, all GSP beneficiaries (three regimes) should ratify and implement effectively all these conventions.

a business association

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Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

The processing and trading sector of fisheries and aquaculture products has always advocated of promoting the principles of sustainable fishing & trade from the perspective of social and environmental aspects in a world level, as well as, the hygienic-sanitary standards. Because of this, the ratification and implementation of all these conventions is considered positive. Therefore, all GSP beneficiaries (three regimes) should ratify and implement effectively all these conventions.

a no profit organisation

India

Research in International Economic Relations

No comments in view of the general response to Q21, challenging the appropriateness of this component of EU GSP.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

No comment

a company

Malaysia

Screw, Nut & Washer

No commend

a company

Malaysia

Manufacturing

not sure

other

Mauritius

International Trade ---- Government official

No

a company

Myanmar

Information Supply

Not sure

other

Panamá

Servicio ---- Ministerio de Comercio e Industria de Panamá

La intención de la Unión de la Unión Europea al requerir el cumplimiento de la lista de los 27 Convenios relevantes para la aplicación del SGP+, es de promover el desarrollo sostenible y facilitar para este propósito, incentivos especiales relacionados con el respeto a los derechos sociales y la protección del medio ambiente, por lo cual, es importante que este requisito se mantenga conforme lo establecido en el presente reglamento.

a company

Qatar

Liquified Natural Gas

GSP+ only applies to 16 beneficiary countries which are considered "vulnerable". We understand that Qatar is not one of those countries, and GSP+ does not apply to Qatargas. Therefore we have no comments.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 23. Delete them all. Economic growth first, good governance comes thereafter. Taiwan, South-Korea, hopefully China and other emerging economies is living examples of the "natural" sequencing of the way for countries to modernity.

a no profit organisation

Sweden

RFSL, The Swdish Federation for Lesbian, Gay, Bisexual and Transgender Rights, is the main LGBT-organisation i Sweden with 29 branches all over the country, working with LGBT rights, LGBT health, operating counselling services, arranging social and cultural activities, working with education, facilitating international projects in cooperation with other stakeholders etc. RFSL is a member of ILGA - International Lesbian, Gay, Bisexual and Transgender Association.

RFSL (The Swedish Federation for Lesbian, Gay, Bisexual and Transgender Rights) urge EU to add respect for basic human rights regardless of sexual orientation or gender identity as a

condition a country has to fulfil before being granted GSP+ status. Although there are yet no international convention dedicated to LGBT human rights possible for all independent countries in the world to ratify, a UN statement supported by 66 nations (among these all EU countries) from dec 2008 demands the inclusion of sexual orientation and gender identity in international human rights protections.

The statement establishes ³the principle of non-discrimination, which requires that human rights apply equally to every human being regardless of sexual orientation or gender identity".

The statement condemns killings, torture, arbitrary arrest, and ³deprivation of economic, social and cultural rights, including the right to health² on the grounds of sexual orientation or gender identity.

The statement urges all nations to ³promote and protect human rights of all persons, regardless of sexual orientation and gender identity² and to end all criminal penalties against people because of their sexual orientation or gender identity.

We suggest that EU requires GSP+ candidate countries to observe the human rights of LGBT-persons as they are layed down in this statement. That would, for example, mean that a GSP+ country can't have any provision in their criminal code that criminalizes sexual acts between two men or two women.

We also urge EU to demand that freedom of forming organisations working for LGBT-rights would be a requirement before granting GSP+ status. The discrimination and stigma lgbt-persons faces in many countries around the world seriously affects lgbt-persons ability to participate on equal terms in society and this has negative effects on the development of entire countries when a large part of the society is in many ways deprived from being acknowledged and deprived human rights. This also affects the economic development in countries when lgbt-persons gets discriminated and stigmatised, may face jail sentences, harassment from authorities or their own family and may choose to leave their homecountry because of this.

other

Switzerland

Policy research and negotiation assistance ---- International organization

A rebalance towards treaties, conventions or code that promote sustainable investment and good business behaviour with complementary monitoring mechanisms, in light of the objective to promote sustainable investment.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

N/A

a citizen

UK

Private

All 27 Conventions are very important. All benefiting countries must ratify and implement all the 27 conventions.

a citizen

UK

Economic research

No: the whole GSP+ exercise was for a particular purpose; don't waste more time on it.

a company

UK

Import and Distribution

not sure. Certainly we should not establish too much of a correaltion between economic advantages and operating good governance on socila issues. Whilst there should be incentives to conform to human rights standards, the human rights should be established more through political intiatives

other

UK

Multi sector trade union - public services, manufacturing and commercial services ---- trade union
GMB believes there should certainly be no deletions but might support the addition of positive conventions/provisions on sustainable development

a business association
United Kingdom
Seafood importation
No comment

a no profit organisation
United Kingdom
Representing workers in all sectors in the UK
There certainly should be no deletions. In addition the core labour standards, there are other important ILO conventions relevant to decent work that should be considered for inclusion. These include those identified as "priority conventions" by the ILO Governing Body in its 1993 decision (Convention 122 on Employment Policy, Conventions 81 and 129 on Labour Inspection and Convention 144 on Tripartite Consultation), other Conventions enjoying widespread support at the ILO (including Convention 155 on Occupational Safety and Health, Convention 102 on Social Security, Convention 103 on Maternity Protection, and Convention 135 on Workers' Representatives), and certain other essential ILO instruments (namely the Promotion of Cooperatives Recommendation, 2002 (No. 193), the Human Resources Development Recommendation, 2004 (No. 195) and the Employment Relationship Recommendation, 2006 (No. 198)).
Additional ILO Conventions dealing specifically with occupational health and safety issues that should be included are Convention 162 on Safety in the Use of Asbestos, as well as others concerning sectors which are recognized as hazardous by the ILO, and Convention 187 on the Promotional Framework for Occupational Safety and Health.

Q24: Should the "Vulnerability" criterion for GSP+ be adjusted -made more stringent or relaxed? Should the exclusion of high-income economies from the possibility to apply for GSP+ be extended to other income groups (eg upper-middle income economies)?

a business association
Austria
representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members
KEINE Veränderung/Erhöhung der Verletzbarkeitsschwelle von derzeit 1 %.

a business association
BANGLADESH
INDUSTRY AND BUSINESS CHAMBER ACTIVITIES
ANYTHING THAT CAN AFFECT A POOR COUNTRY ELIGIBLE FOR GSP SHOULD BE RELAXED

a business association
Belgium
representing interests of companies of all sizes and sectors of activity in Europe
The vulnerability criterion should not be adjusted.

a business association
Belgium
representation of interests of the EU food and drink industry
It does not appear to be an acceptable solution to provide GSP+ to upper-middle income economies under the same conditions as for other developing countries. For this purpose,

diversification of exports, as a vulnerability criterion, should be calculated on the basis of real trade flows and not only those under GSP.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

We are of the opinion that GSP should be restricted to those countries which need it the most: in our view, LDC's are the most appropriate beneficiaries.

a business association

Belgium

Trade association: Man-made fibres

Yes

a business association

Belgium

Textiles & Clothing

The other critical condition to obtain GSP+ status is the Vulnerability threshold. The current threshold (1%) should be kept unchanged. Moreover we should consider other elements which might indicate a condition of less vulnerability- eg. public subsidies to exports, restrictions to raw materials exports, restrictions to FDI.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

The definition of the "vulnerability" criterion is too restrictive, in particular the criterion of a small percentage of total GSP-covered imports. In its current shape, this criterion excludes bigger, but poor and commodity-dependent (and therefore not less "vulnerable") suppliers. If maintained at all, the "vulnerability" criterion should be significantly relaxed. If sustainable development is the purpose of the GSP+, the EU should have an interest to offer this special incentive to more than only low income economies.

a business association

Belgium

Representing the foreign trade interests of European retail trade

The vulnerability criterion for GSP+ should be applied in a more relaxed way (2% instead of 1% of the respective GSP covered trade share to the EU).

a citizen

Belgium

Finance

No

a company

Belgium

Import of food items

The complete failure of having reached until now its real and honest objectives, is that it has been massively abused only to satisfy the " needs " = greed of some importers

a no profit organisation

Belgium

Agricultural and Agrifood Trade

No comment.

a no profit organisation

Belgium

trade

Should remain the same Should not be extended

a no profit organisation

Bolivia
Trade and export promotion, export companies advice
No

a no profit organisation
Bolivia
International Trade Promotion and Technical Assistance
No

other
Bolivia
Government ---- Government Official
The vulnerability criterion for GSP+ does not need to be more stringent since there are already very few beneficiaries.

a company
Cambodia
Export
No comment

other
Colombia
Tourism and Trade (Import-Export) ---- Government of Colombia
Colombia estimates that vulnerability is a correct criterion; however, serious circumstances generated in a country from fighting against drugs should prevail. Indeed, everyone should contribute to fight this problem. Consequently, one should consider that a country is sufficiently vulnerable when it has to endure such a serious problem with negative effects for the whole country at all levels.

a business association
Ecuador
Ecuadorian Exportes Federation
No se debe modificar los criterios actualmente vigentes para la consideración de vulnerabilidad.

other
Ecuador
Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador
The criteria of “vulnerability” should not be modified.

a business association
Finland
Trade Policy
The effects of changes in the vulnerability criterion should be examined.

a business association
France
MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies
Exclusion should be extended to upper-middle income economies. The current “vulnerability” criterion must be maintained at its current level.

a business association
France
Textile
No the current threshold 1% should be maintained.

a business association
Germany
Industry

the "vulnerability" criterion for GSP+ should not be relaxed because it would increase the competition for the most vulnerable countries from more advanced or bigger beneficiary countries.

a company

Germany

Think-tank for European and international economy and governance

the more the EU lifts customs, the less GSP will be relevant, or GSP+

a company

Germany

All high- and middle income economies should be excluded from GSP+ to take into account the different competitiveness status of different countries and sector.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

The current architecture of the GSP scheme (Standard GSP, GSP + and EBA) is working well since allowing to consider the different levels of development of the countries. The GSP + is granted to vulnerable countries according to the criteria set in the regulation. Therefore, the high-income economies should be excluded from the possibility to apply for the GSP+. Regarding the possibility to extend the exclusion of high-income economies from the possibility to apply for GSP+ to upper-middle income economies, we should be extremely careful because some upper-middle income economies, according to World Bank, such as, Peru Colombia, Costa Rica... are currently beneficiaries from the GSP+ and therefore they continue to be it in next regulation.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

The current architecture of the GSP scheme (Standard GSP, GSP + and EBA) is working well since allowing to consider the different levels of development of the countries. The GSP + is granted to vulnerable countries according to the criteria set in the regulation. Therefore, the high-income economies should be excluded from the possibility to apply for the GSP+. Regarding the possibility to extend the exclusion of high-income economies from the possibility to apply for GSP+ to upper-middle income economies, we should be extremely careful because some upper-middle income economies, according to World Bank, such as, Peru Colombia, Costa Rica... are currently beneficiaries from the GSP+ and therefore they continue to be it in next regulation.

a no profit organisation

India

Research in International Economic Relations

One of the reasons that make the special incentives programme unacceptable is the arbitrariness of the vulnerability criterion. The share of trade under the GSP is a function of the size of the economy and exclusion of those with more than one percent share is manifestly unfair for beneficiary countries with a larger supplying base.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

No, current vulnerability criteria are perfectly right.

a company

Malaysia

Screw, Nut & Washer

No

a company
Malaysia
Manufacturing
should be more stringent exclusion should remain with high income economies

a company
Malaysia
Manufacturer
more relaxed. No.

other
Mauritius
International Trade ---- Government official
The vulnerability criterion should be more stringent and upper middle income countries excluded completely with the exception of SIDS

a business association
Myanmar
Association
The "Vulnerability" criterion for GSP+ should be more relaxed, since the beneficiary countries are all developing or least developed, and are all in need of all kinds of supports from the developed countries. Since GSP, GSP+ are goodwill gestures, it would be nice, if you can extend this privilege to upper-middle income economies.

a company
Myanmar
Information Supply
Yes if it helps the least developing countries have access to EU markets.

other
Panamá
Servicio ---- Ministerio de Comercio e Industria de Panamá
El criterio de vulnerabilidad exigido para el SGP+, debe mantenerse de conformidad con el actual reglamento.

a business association
Portugal
Textile and Clothing Industry
The other critical condition to obtain GSP+ status is the Vulnerability threshold. The current threshold (1%) should be kept unchanged. Moreover we should consider other elements which might indicate a condition of less vulnerability- eg. public subsidies to exports, restrictions to raw materials exports, restrictions to FDI.

a company
Qatar
Liquified Natural Gas
No comment.

a business association
Sweden
Representing the Swedish textile-, garment-, and shoe import trade
Q 24. We think it is about right as it is. But we don't think that countries should be made to apply for it. It is humiliating for many countries.

other
Switzerland
Policy research and negotiation assistance ---- International organization

The current criterion is Eurocentric (focused on EU imports) and has no direct relation with actual vulnerability. The countries recognized as SVEs in the NAMA negotiations at the WTO are a better reflection of countries that can be considered vulnerable.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

N/A

a citizen

UK

Economic research

End exclusion of high-income countries. There is no reason for it if the objective is to encourage adoption of the conventions.

a company

UK

Import and Distribution

not relaxed

a no profit organisation

UK

Development Education, campaigns + advocacy

Upper-middle income countries should not be excluded. The definition of 'vulnerability' implies a disparity in income between industries within the country. That is, those in certain industries may enjoy 'upper-middle' income, but this does not apply across the board. Preference should be given to the least advantaged.

a business association

United Kingdom

Seafood importation

No comment

Q25: Should the application windows for GSP+ (currently every 18 months) and the period of time for which GSP+ is granted (currently for either 18 months or 3 years) be adjusted? If so, how?

a business association

Belgium

Cocoa sector

We would prefer if validity period of the GSP+ scheme could be aligned to the extended GSP period (see Q8).

a business association

Belgium

International trade in flowers

The application window for the GSP+ should be adapted to developing countries' needs. To ensure the necessary predictability and legal certainty, however, the application window needs to be timed in such a way as to enable the announcement of all elements of the GSP+ one year prior to its entry into force. The time for which GSP+ is granted should be aligned with the duration of the general GSP scheme.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

Yes, it should be adjusted from 3 to 5 years provided the country abides by the GSP+ commitments or is not graduated from GSP for competitiveness reasons, there is no reason to limit this.

a business association

Belgium

International trade

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a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

A yearly revision seems more appropriate.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

FESI believes that the application windows as they are presently applied are fine. However if the goal is to further assist GSP+ countries then a transparent, open "pre-warning system" with clear milestones and thresholds of likelihood is more helpful to the involved industry than any "changes" in the windows.

a business association

Belgium

Trade association: Man-made fibres

No

a business association

Belgium

Textiles & Clothing

The timeframe for application and granting GSP+ benefits should be kept as it is today- 18 months.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

The application window for the GSP+ should be adapted to developing countries' needs. To ensure the necessary predictability and legal certainty, however, the application window needs to be timed in such a way as to enable the announcement of all elements of the GSP+ one year prior to its entry into force. The time for which GSP+ is granted should be aligned with the duration of the general GSP scheme.

a business association

Belgium

Representing the foreign trade interests of European retail trade

GSP+ must be granted during the whole validity of the scheme.

a citizen

Belgium

Finance

No

a company

Belgium

Import of food items

In view of a real honest worldwide economical system, not the importing EU-countries should benefit / profit from artificially lowered prices... but the developing and poor countries should get FAIR prices and fair trade from us !

a no profit organisation
Belgium
Development NGO
Countries should be able to enter at any time

a no profit organisation
Belgium
Agricultural and Agrifood Trade
The application procedure should be more flexible in order for countries to apply and enter into the GSP scheme at any time and not every 18 months, however at the same time a transition period has to be foreseen enabling predictability and planning for economic operators.

a no profit organisation
Belgium
trade
It should be for longer periods

a no profit organisation
Bolivia
Exportaciones
Puede ser incrementado

a no profit organisation
Bolivia
Trade and export promotion, export companies advice
We think that could be at least 5 years

a no profit organisation
Bolivia
Representación de todos los Despachantes de Aduana de Bolivia.
Podría estudiarse un eventual ajuste considerando el tiempo que las economías sienten efectos de un cambio en la reglamentación del SGP.

a no profit organisation
Bolivia
International Trade Promotion and Technical Assistance
Yes, the term of the GSP+ should be at least for five years

a no profit organisation
Bolivia
industry
The period of time for which GSP+ is granted should be adjusted to at least a 5 year period in order to have certainty for investments and guarantee truly access to the European market.

other
Bolivia
Government ---- Government Official
It would be better to adjust the period of time for which GSP+ is granted and make it longer, to ensure more predictability. Having to renew the regulations creates uncertainty.

other
Bolivia
Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio
Puede ser incrementado

a company

Cambodia
Export
No comment.

other
Colombia
Tourism and Trade (Import-Export) ---- Government of Colombia
Indeed, Regulations should be adjusted every five years. This ensures stability and predictability in investments and new projects developed as use of the schema.

a business association
Ecuador
Ecuadorian Exportes Federation
El plazo de vigencia debería ser ampliado a 5 años conforme a la vigencia del Reglamento actual. La evaluación del esquema puede continuar a medio período.

a business association
Ecuador
Tuna Industry
Should be adjusted for 5 years

other
Ecuador
Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador
It would be advisable to extend the validity period of the Regulation to 5 years, and to keep the application terms in order to benefit from the system (18 months).

a business association
Finland
Trade Policy
The possibility of extension should be examined.

a business association
France
MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies
We think that a period of grace of 3 years should be necessary.

a company
Germany
Think-tank for European and international economy and governance
would it be helpful if it were extended to 2 ys? (even 2 1/2 or 3?) ? Sometimes companies don't get thenews in GSP reciiient countries before the end of the programme (18 ms)!

a company
Germany
No. But might have to be adjusted depending on the duration of the legislation.

a business association
In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...
Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).
Regarding the revision of GSP +, it is necessary to provide the system with stability. Thus, the Regulation should be 5 - 7 years long. Concerning access to the GSP + or amendments, the period should be shorter than 18 months (for example, 6 - 12 months).

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

Regarding the revision of GSP +, it is necessary to provide the system with stability. Thus, the Regulation should be 5 - 7 years long. Concerning access to the GSP + or amendments, the period should be shorter than 18 months (for example, 6 - 12 months).

a no profit organisation

India

Research in International Economic Relations

No comments in view of the general response to Q21, challenging the appropriateness of this component of EU GSP.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

We believe that additional opportunity for applying for GSP+ could be provided once during the validity of the regulation (mid-term).

a company

Malaysia

Screw, Nut & Washer

Yes. Should be extended to 5years

a company

Malaysia

Manufacturing

not sure

a company

Myanmar

Information Supply

no

other

Panamá

Servicio ---- Ministerio de Comercio e Industria de Panamá

La ventana de aplicación para el SGP+ de 18 meses y el tiempo durante el cual se otorga este beneficio (ya sea de 18 meses o 3 años) debe mantenerse conforme al reglamento actual.

a business association

Portugal

Textile and Clothing Industry

The timeframe for application and granting GSP+ benefits should be kept as it is today- 18 months.

a company

Qatar

Liquified Natural Gas

No comment.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 25. We do not like an application system. Just publish the list for eligible countries. As stated above we think 5 year turns are suitable.

other

Switzerland

Policy research and negotiation assistance ---- International organization

Yes, at least 5 years, to allow countries to align their export or industrial development strategies to the scheme

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

N/A

a citizen

UK

Private

No

a citizen

UK

Economic research

The window should always be open: there aren't that many countries potentially eligible, and all have particular circumstances. I can't see why the EC should have any difficulty in dealing with applications at any time. To give other exporters competing with a new GSP+ country time to adjust, there should then be a one year delay between granting the status and implementing it. 3 years is the sensible period.

a company

UK

Import and Distribution

it's okay as it is

a business association

United Kingdom

Seafood importation

No comment

Q26: Should the current procedural arrangements for ongoing monitoring of the compliance of GSP+ beneficiaries with the substantive requirements of the special regime be reinforced in any way? How could this be achieved, while not duplicating or undermining the role of international organizations and their monitoring bodies?

a no profit organisation

Austria

trade policy

The monitoring and approval arrangements under the GSP+ regime could be greatly strengthened by firstly allowing other parties to provide additional information on compliance that complements monitoring bodies, and secondly making monitoring processes more transparent. The procedural arrangements for monitoring compliance and approving applications of GSP+ beneficiaries should be amended to allow stakeholders with a demonstrable interest in the matter, such as trade unions or human rights organisations, to submit relevant information on the question of effective implementation. This is important for several reasons.

Firstly, conclusions from monitoring bodies can be out of date, particularly where events on the ground are moving quickly (e.g. the military coup in Honduras) or fall outside of the reporting cycles of monitoring bodies. When countries apply to join GSP+ often the reports from monitoring bodies are out of date.

Secondly, some conventions do not have monitoring bodies allied with them.

Thirdly, allowing third party submission would be adopting best practice on obtaining the views of civil society, in line with similar processes, increasing public confidence in the system. None of this is to duplicate or undermine the role of the ILO, which has the clear mandate for setting and monitoring the application of labour standards.

Additionally, the Commission can play an enhanced role in monitoring and approval through the creation of Labour Attachés in EC country delegations tasked with ensuring coherence with the ILO and EU Human Rights dialogue processes and monitoring and benchmarking national level progress on effective implementation. They could also play the central role in ensuring EC technical assistance is best targeted to assist national governments in reaching benchmarks.

Further, there are other GSP schemes and FTAs which have their own monitoring processes - for example, the United States, through its US Trade Representative conducts its own monitoring and approval processes for GSP beneficiaries. Coordinating with these other schemes or mechanisms would greatly increase the effectiveness of both monitoring, and with coordinated leverage, improvements in implementation. The best way to drive such coherence in the longer term would be through the formation within the WTO of a working party on trade, globalisation, development and decent work, with a key role for the ILO - a long standing demand of the international trade union movement. Transparency in monitoring is an area that needs urgent reform.

For trade unions, it is not clear what information the Commission considers in approving applications or monitoring, nor how it uses that information. Concerns about transparency are shared by many member states and also called for in a recent draft opinion of the Committee on Employment and Social Affairs for the Committee on International Trade (see 2009/2219(INI)). As a basic principle, the Commission should list and publish what information it is considering, what decision it has arrived at, and the reasons for that decision, before the approval of applications. The applications from countries applying or seeking renewal of their GSP+ status should also be made public.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

ROLE OF INTERNATIONAL ORGANISATION IS IMPORTANT BUT NOT AT THE COST OF PUTTING LARGER PRESSURE ON THE POOR ECONOMIS. IN TODAYS WORLD, ALL ECONOMIES CAN FARE BETTER IF SUCH ORGANISATION INTERFERE LESS. AS SUCH FOR GSP WE SHOULD NOT LOOK INTO THE ROLE OF THESE BODUIES

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

Yes, for example by making a link to the Governance Action Plans put in place under EU development policy.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

No specific comments in this respect.

a business association

Belgium

Trade association: Man-made fibres

No comment

a business association

Belgium

Textiles & Clothing

Considering the objectives behind the GSP+ it is crucial to ensure that all the criteria are fully met whenever a country applies for this special treatment. The political willingness from a country to sign and implement the International Conventions is not enough. Effective implementation and enforcement should be ensured and monitored before giving any benefit. A safety time lapse should occur between the moment the country ratifies the Conventions and the moment it is apt to apply for GSP +. In this way we might be able to avoid a considerable

number of costly and unnecessary “à posteriori” investigations just to verify that the country is not complying with GSP+ conditions. The existing EU Delegations should also be an efficient and secure way to control the country’s compliance with the criteria

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

If the necessary stability and one year predictability are guaranteed, EuroCommerce will accept any solution that objectively serves development purposes.

a business association

Belgium

Representing the foreign trade interests of European retail trade

The current procedural arrangements must not be reinforced.

a no profit organisation

Belgium

Development NGO

The Commission should undertake investigations upon the submissions of a body representing social partners and CSOs or of a parliamentary committee

a no profit organisation

Belgium

Agricultural and Agrifood Trade

No comment.

a no profit organisation

Belgium

trade union

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Secondly, some conventions do not have monitoring bodies allied with them.

Thirdly, many monitoring bodies report against their own criteria which do not necessary fit with the EU’s test of “effective implementation”.

Fourthly, allowing third party submission would be adopting best practice on obtaining the views of civil society, in line with similar processes, increasing public confidence in the system. None of this is to duplicate or undermine the role of the ILO, which has the clear mandate for setting and monitoring the application of labour standards. Additionally, the Commission can play an enhanced role in monitoring and approval through the creation of Labour Attachés in EC country delegations tasked with ensuring coherence with the ILO and EU Human Rights dialogue processes and monitoring and benchmarking national level progress on effective implementation. They could also play the central role in ensuring EC technical assistance is best targeted to assist national governments in reaching benchmarks.

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a no profit organisation

Belgium

trade

No, the International organizations should be monitoring the compliance

other

Belgium

Representing working people in all sectors throughout Europe ---- European Trade Union Confederation

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Additionally, the Commission can play an enhanced role in monitoring and approval through the creation of specialist Labour Attaché posts (including some staff drawn from European social partners' organisations) in EU delegations under the new External Action Service, tasked with ensuring coherence with the ILO and EU Human Rights dialogue processes and monitoring and benchmarking national level progress on effective implementation. They could also play the central role in ensuring EC technical assistance is best targeted to assist national governments in reaching benchmarks.

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what decision it has arrived at, and the reasons for that decision, before the approval of applications. The applications from countries applying or seeking renewal of their GSP+ status should also be made public. Consideration should also be given to what role the Vienna-based Fundamental Rights Agency could play in monitoring and enforcement and ensuring coherence in EU approaches.

other

Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)

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a no profit organisation

Bolivia

Trade and export promotion, export companies advice

No

a no profit organisation
Bolivia
International Trade Promotion and Technical Assistance
It is not necessary

a company
Cambodia
Export
No comment.

a business association
Ecuador
Ecuadorian Exportes Federation
Los convenios que deben ser suscritos son controlados y evaluados a nivel multilateral. La información relativa a su cumplimiento está disponible para las partes y su verificación puede hacerse sin mayor complicación.

other
Ecuador
Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador
Being a part of the multilateral structure, we must, in principle, trust the work done by the supervision bodies of the international conventions which are part of the GSP+. Nevertheless, the task of verification of the information received should be reinforced with the concerned country, when the said information could lead to a suspension of the benefits of the GSP+.

a business association
Finland
Trade Policy
The monitoring should be reinforced but primarily by the current bodies.

a business association
France
Textile
Effective implementation an enforcement should be ensured and monitored before giving any benefit.

a company
Germany
Think-tank for European and international economy and governance
don't know the monitoring details

a business association
In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...
Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).
There should be a greater coordination between the different competent organizations to control the requirements of the GSP+ to avoid an ineffective control and a duplication of tasks. Thus, the European Commission should be coordinated with the UNO and ILO to control and supervise the effective implementation of the international conventions related to the human & labour rights and environmental and governance principles.

a business association
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Thus, the European Commission should be coordinated with the UNO and ILO to control and supervise the effective implementation of the international conventions related to the human & labour rights and environmental and governance principles.

a no profit organisation

India

Research in International Economic Relations

No comments in view of the general response to Q 21, challenging the appropriateness of this component of the EU GSP.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

The main problem lays not in monitoring of the conventions, which have operative monitoring bodies, but of the conventions, which have no monitoring bodies, or their monitoring activities are very vague. For such cases the Commission should develop its own monitoring procedures.

a company

Malaysia

Screw, Nut & Washer

No

a company

Malaysia

Manufacturing

not sure

a company

Myanmar

Information Supply

yes.

other

Panamá

Servicio ---- Ministerio de Comercio e Industria de Panamá

Las organizaciones internacionales que han tenido la iniciativa de crear Convenciones o Convenios a favor de diferentes temas de importancia mundial, son las entidades competentes para dar seguimiento al cumplimiento de los compromisos adquiridos por los países han ratificado dichos acuerdos.

a business association

Portugal

Textile and Clothing Industry

Considering the objectives behind the GSP+ it is crucial to ensure that all the criteria are fully met whenever a country applies for this special treatment. The political willingness from a country to sign and implement the International Conventions is not enough. Effective implementation and enforcement should be ensured and monitored before giving any benefit. A safety time lapse should occur between the moment the country ratifies the Conventions and the moment it is apt to apply for GSP +. In this way we might be able to avoid a considerable number of costly and unnecessary "à posteriori" investigations just to verify that the country is not complying with GSP+ conditions. The existing EU Delegations should also be an efficient and secure way to control the country's compliance with the criteria.

a company

Qatar

Liquified Natural Gas

Compliance monitoring activities should strike the right balance between risks and benefits, and should not duplicate or encroach on the roles of existing international bodies in this area.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 26. Give up monitoring. Don't try to act as a chicken mother all the time.

other

Switzerland

Policy research and negotiation assistance ---- International organization

This should be discussed at the relevant international organization, if any. Important is that there is some independence from the European Commission and involvement of civil society

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

N/A

a company

UK

Import and Distribution

no changes to procedure

other

UK

Multi sector trade union - public services, manufacturing and commercial services ---- trade union

Yes. Developing countries currently on the GSP+ component are awarded a higher level of trade preferences than the GSP/EBA beneficiaries in return for abiding by the stricter test of "effective implementation" of these and other conventions. GMB believes that the current process of judging effective implementation is too weak and expectations are set too low.

The monitoring and approval arrangements under the GSP+ regime would be greatly strengthened by making the monitoring processes more transparent, and allowing other parties, including democratic independent trade unions, to provide additional information on implementation, compliance and enforcement that complements monitoring bodies. This would neither duplicate nor undermine the role of other international monitoring bodies such as the ILO, which has a clear and undisputed mandate for setting and monitoring the application of labour standards. Rather it would compliment the work of these bodies, as conclusions from them can sometimes be out of date, particularly where events on the ground are moving quickly (e.g. the military coup in Honduras) or fall outside of the reporting cycles of monitoring bodies.

The Commission's question suggests that monitoring is more "ongoing" and systematic than it in fact is. Formal investigations and missions by ILO and other monitoring bodies to countries does not happen regularly enough, often due to limited resources.

GMB has concerns that the EU Commission currently attempts to abdicate its ultimate responsibility in this area too much. When the EU Commission receives a complaint regarding the non-compliance with the provisions of GSP+ from a genuine source such as an independent trade union, it should take a far more pro-active role in ensuring effective and speedy investigation through the monitoring bodies, but also through investigations via their missions in the countries/regions concerned where they have them, and should be tracking the progress and results closely.

The test of "effective implementation" has to be more clearly and strongly defined with a universally applied set of criteria for monitoring bodies to report against to ensure they fit the test and avoid inconsistency, confusion and any feeding of non-compliance. GMB would like to see the EU Commission delegation offices in countries under the system playing an enhanced role in monitoring and approval, possibly through the creation of Labour Attachés working in co-operation with the ILO and EU Human Rights dialogue processes and monitoring and benchmarking national level progress on effective implementation. They could also play the central role in ensuring EC technical assistance is best targeted to assist national governments in reaching benchmarks.

There are a number of other effective schemes in other trade agreements which could help develop best practice in monitoring, and ensure more a general raising of standards in this area, such as the domestic advisory groups including trade union representatives planned in the Korean agreement. The best way to drive such coherence in the longer term would be through

the formation within the WTO of a working party on trade, globalisation, development and decent work, with a key role for the ILO - a long standing demand of the international trade union movement. Transparency in monitoring is an area that needs urgent reform.

For trade unions, it is not clear what information the Commission considers in approving applications or monitoring, nor how it uses that information. Concerns about transparency are shared by many Member States. As a basic principle, the Commission should list and publish what information it is considering, what decision it has arrived at, and the reasons for that decision, before the approval of applications. The applications from countries applying or seeking renewal of their GSP+ status should also be made public.

a business association
United Kingdom
Seafood importation
No comment

a no profit organisation
United Kingdom
Representing workers in all sectors in the UK

The monitoring and approval arrangements under the GSP+ regime could be greatly strengthened by firstly allowing other parties to provide additional information on compliance that complements monitoring bodies, and secondly making monitoring processes more transparent. The procedural arrangements for monitoring compliance and approving applications of GSP+ beneficiaries should be amended to allow stakeholders with a demonstrable interest in the matter, such as trade unions or human rights organisations, to submit relevant information on the question of effective implementation. This is important for several reasons.

Firstly, conclusions from monitoring bodies can be out of date, particularly where events on the ground are moving quickly (e.g. the military coup in Honduras) or fall outside of the reporting cycles of monitoring bodies. When countries apply to join GSP+ often the reports from monitoring bodies are out of date.

Secondly, some conventions do not have monitoring bodies allied with them.

Thirdly, many monitoring bodies report against their own criteria which do not necessary fit with the EU's test of "effective implementation".

Fourthly, allowing third party submission would be adopting best practice on obtaining the views of civil society, in line with similar processes, increasing public confidence in the system. None of this is to duplicate or undermine the role of the ILO, which has the clear mandate for setting and monitoring the application of labour standards.

Additionally, the Commission can play an enhanced role in monitoring and approval through the creation of specialist Labour Attache posts (including some staff drawn from European social partners' organisations) in EU delegations under the new External Action Service, tasked with ensuring coherence with the ILO and EU Human Rights dialogue processes and monitoring and benchmarking national level progress on effective implementation. They could also play the central role in ensuring EC technical assistance is best targeted to assist national governments in reaching benchmarks.

Further, there are other GSP schemes and FTAs which have their own monitoring processes - for example, the United States, through its US Trade Representative conducts its own monitoring and approval processes for GSP beneficiaries. Coordinating with these other schemes or mechanisms would greatly increase the effectiveness of both monitoring, and with coordinated leverage, improvements in implementation. The best way to drive such coherence in the longer term would be through the formation within the WTO of a working party on trade, globalisation, development and decent work, with a key role for the ILO - a long standing demand of the international trade union movement. Transparency in monitoring is an area that needs urgent reform.

For trade unions, it is not clear what information the Commission considers in approving applications or monitoring, nor how it uses that information. Concerns about transparency are shared by many member states and also called for in a recent draft opinion of the Committee on Employment and Social Affairs for the Committee on International Trade (see 2009/2219(INI)). As a basic principle, the Commission should list and publish what information it is considering, what decision it has arrived at, and the reasons for that decision, before the approval of applications. The applications from countries applying or seeking renewal of their GSP+ status

should also be made public. Consideration should also be given to what role the Vienna-based Fundamental Rights Agency could play in monitoring and enforcement and ensuring coherence in EU approaches.

Q27: The current eligibility criteria for GSP+ require that beneficiaries have implemented a set of international conventions. What would be the best ways to measure effectively achievements in this domain?

a no profit organisation
Austria
trade policy

The Commission currently adopts an informal approach of requiring beneficiary countries to demonstrate continual improvements in implementation. However, without clear benchmarks measuring improvement, and with a lack of transparency of this process, it can be difficult for trade unions to see such improvements and have confidence in the system.

Firstly, the revised regulation should capture this requirement of “continuous improve-ment” by reference to existing monitoring systems and especially the ILO supervisory system, including reference to using observations by the Committee of Experts which, read carefully, indicate various stages of progress, standstill or backsliding.

Secondly, the Commission should develop a clear system of benchmarks to monitor, drive and de-monstrate progress. The ILO is currently developing “Decent Work” Indicators, which will include benchmarks for quantifying progress in the application of the core labour stan-dards.

The Commission could revise the GSP regulation to ensure that it considers such benchmarking in making assessments of effective implementation, while recognising that not all principles of conventions can be easily quantified and that qualitative measures of progress will also remain relevant.

a business association
BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

ANY SET RULES TO BE FOLLOWED BY A COUNTRY WHICH IS POOR AND LACKS INFRASTRUCTURE IS DIFFICULT. THE MEASURE IS SIMPLE- ITS ENCOME PER HEAD. ALL TOOLS SHOULD BE EMPLOYED TO GET THIS CORRECT.

a business association
Belgium

representing interests of companies of all sizes and sectors of activity in Europe

EU delegations should involve local private sector business organisations in measuring the achievements.

a business association
Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

Again, should trade defence measures be applied, for those products/countries, GSP (and certainly GSP+) should not be granted.

a business association
Belgium

Trade association: Man-made fibres

To control through EU offices

a business association
Belgium

Textiles & Clothing

The country in question should have "de facto" implemented the international conventions by incorporating the principles and rules in the national legislation and by applying and enforcing the legislation.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

By nature, measuring such kind of achievement is problematic and it is difficult to identify transparent and convincing criteria. Among the various relevant actors, the ILO would still be best suited to measure the achievements currently included in the GSP+.

a business association

Belgium

Representing the foreign trade interests of European retail trade

Question must be addressed to diplomatic missions in supplier countries.

a no profit organisation

Belgium

Agricultural and Agrifood Trade

No comment.

a no profit organisation

Belgium

trade union

The Commission currently adopts an informal approach of requiring beneficiary countries to demonstrate continual improvements in implementation. However, without clear benchmarks measuring improvement, and with a lack of transparency of this process, it can be difficult for trade unions to see such improvements and have confidence in the system.

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Secondly, the Commission should develop a clear system of benchmarks to monitor, drive and demonstrate progress. The ILO is currently developing "Decent Work" Indicators, which will include benchmarks for quantifying progress in the application of the core labour standards. The Commission could revise the GSP regulation to ensure that it considers such benchmarking in making assessments of effective implementation, while recognising that not all principles of conventions can be easily quantified and that qualitative measures of progress will also remain relevant.

a no profit organisation

Belgium

trade

Through the International bodies responsible for the conventions

other

Belgium

Representing working people in all sectors throughout Europe ---- European Trade Union Confederation

The Commission currently adopts an informal approach of requiring beneficiary countries to demonstrate continual improvements in implementation. However, without clear benchmarks measuring improvement, and with a lack of transparency of this process, it can be difficult for trade unions to see such improvements and have confidence in the system.

Firstly, the revised regulation should capture this requirement of "continuous improvement" by reference to existing monitoring systems and especially the ILO supervisory system, including reference to using observations by the Committee of Experts which, read carefully, indicate various stages of progress, standstill or backsliding.

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The Commission could revise the GSP regulation to ensure that it considers such benchmarking in making assessments of effective implementation, while recognising that not all principles of conventions can be easily quantified and that qualitative measures of progress will also remain relevant.

other

Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)

The Commission currently adopts an informal approach of requiring beneficiary countries to demonstrate continual improvements in implementation. However, without clear benchmarks measuring improvement, and with a lack of transparency of this process, it can be difficult for trade unions to see such improvements and have confidence in the system.

Firstly, the revised regulation should capture this requirement of "continuous improvement" by reference to existing monitoring systems and especially the ILO supervisory system, including reference to using observations by the Committee of Experts which, read carefully, indicate various stages of progress, standstill or backsliding.

Secondly, the Commission should develop a clear system of benchmarks to monitor, drive and demonstrate progress. The ILO is currently developing "Decent Work" Indicators, which will include benchmarks for quantifying progress in the application of the core labour standards. The Commission could revise the GSP regulation to ensure that it considers such benchmarking in making assessments of effective implementation, while recognising that not all principles of conventions can be easily quantified and that qualitative measures of progress will also remain relevant

a no profit organisation

Bolivia

Exportaciones

No se deben mezclar temas comerciales con otros temas no vinculados al ambito productivo exportador

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

The representative of the European Union in each beneficiary country with the governments of these countries, can document the effective implementation of the international agreements.

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

La forma de medir debería ser estudiar el grado de cumplimiento de los acuerdos firmados y en función a ello determinar si se continua con el beneficio del SGP o no.

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

Delegate the representative of the European Union in each beneficiary country so along with the governments of these countries, can document the effective implementation of the international agreements

other

Bolivia

Government ---- Government Official

Beneficiary countries continuously present reports

other

Bolivia

Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio

Consideramos que no se deben mezclar temas comerciales con otros temas no vinculados al ámbito productivo y exportador

a company
Cambodia
Export
No comment.

other
Colombia
Tourism and Trade (Import-Export) ---- Government of Colombia
Colombia considers that multilateral bodies in charge of the different international conventions are the competent authorities to effectively assess the progress of each country with respect to each convention. Total credibility should be given to the evaluation and the follow-up procedure performed by such multilaterally established institutions.

a business association
Ecuador
Ecuadorian Exportes Federation
La respuesta anterior es aplicable a esta pregunta.

other
Ecuador
Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador
The prevailing eligibility system allows an adequate operation; therefore it is not advisable to modify its requirements.

a business association
France
Textile
The beneficiaries countries must give all evidences about the implementation of international convention and other side the European Union must realize some controls directly in these countries.

a company
Germany
Think-tank for European and international economy and governance
it depends of the costs of monitoring of these implementations of conventions; perhaps one could do once a RIA for the GSP+ recipient countries?

a company
germany
chemical production
audits being done by te responsible local government bodies

a no profit organisation
Germany
trade union
A benchmark (e.g. the millenium Development goals) is an effective way to measure achievements. Some countries are performing better than others even if they are on a comparable development level. The GSP+ should only be granted to those that are best performing.

a business association
In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...
Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).
Establishing effective controls in coordination with International Organisations responsables for these matters (UNO and ILO).

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

Establishing effective controls in coordination with International Organisations responsible for these matters (UNO and ILO).

a no profit organisation

India

Research in International Economic Relations

No comments in view of the general response to Q 21, challenging the appropriateness of this component of the EU GSP.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

No comment

a company

Malaysia

Screw, Nut & Washer

The current method is the best

a company

Malaysia

Manufacturing

not sure

other

Mauritius

International Trade ---- Government official

Joint assessment will have to be made by the beneficiary country and the commission. Moreover signature of the agreement should not be sufficient but should be followed by ratification and implementation

a company

Myanmar

Information Supply

Not sure

a company

Qatar

Liquified Natural Gas

A risk-based, in-country, independent monitoring scheme would provide assurance over the success or otherwise of the implementation of the eligibility criteria.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 27. Refrain. No country in the world live up to all the criteria in those 27 conventions, not Spain when it comes to growing vegetables in the Spanish desert with illegal immigrant workers from Africa, not Germany when it comes to asparagus harvest, illegal workers thru out EU, the mafia economy in Italy and so on so forth, treatment of refugees in Sweden etcetera. Child labour one can find in any EU country, some has not even signed the basic ILO conventions.

other

Switzerland

Policy research and negotiation assistance ---- International organization

It is difficult to get into the specifics. Obviously, a benchmark needs to be established first. It needs to detail what is measured and how it is measured. Subsequent measurement should be performed independently from the European Commission

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

N/A

a citizen

UK

Private

EU investigating team should visit the countries and investigate all human rights abuses. However Sri Lanka has refused to let the EU team into Sri Lanka to investigate alleged abuses.

a citizen

UK

Economic research

For some, there are procedures under the convention for complaints of violation: rely on these. For others, provide a forum for complaints.

a company

UK

Import and Distribution

they should be measured against a "basket" of selected countries in the EU, in the GSP scheme and out of any scheme(EBA). A Red, Amber, Green rating should be issued with expiry dates for each status.

other

UK

Multi sector trade union - public services, manufacturing and commercial services ---- trade union

The current informal approach of requiring beneficiary countries to demonstrate continual improvements in implementation is not satisfactory. Clear benchmarks measuring improvement and transparency in monitoring are needed to encourage confidence in the system.

An example of the weakness of the current system is that, in Costa Rica, the Government has legislation pending under the title of the Labour Procedures Reform Bill awaiting approval (which could be any time); which superficially might sound like a positive development, yet the contents of this Bill strike at the heart of trade union freedoms to organise by promoting and legitimising the development of anti-union permanent committees and direct settlements, and at the same time completely undermining the collective bargaining rights and role of independent trade unions.

Furthermore, the Solidarismo movement has been given a special mention in the text of the Political Constitution in April 2010, and can now benefit from state funds to support anti-union work. The ILO reported on the worrying development of these structures and activities in 2008, and saw it as a clear breach of ILO conventions, yet the GSP+ status of Costa Rica was renewed without formal investigation, and no formal pressure has to date been put on the country by the EU to withdraw these proposals in Costa Rica.

Trade unions believe this development warrants urgent investigation and action by the EU. The revised regulations should clearly define what is required by "continuous improvement" and assess this through reference to existing monitoring systems, especially the ILO supervisory system, and using reference to observations by the Committee of Experts.

The Commission should revise the GSP regulation to include a clear system of benchmarks to monitor, drive and demonstrate progress in assessing effective implementation. The ILO is currently developing "Decent Work" Indicators, which will include benchmarks for quantifying progress in the application of the core labour standards. The EU Commission could use this as a valuable reference point in developing such a benchmarking system.

a business association

United Kingdom

Seafood importation
No comment

a no profit organisation
United Kingdom

Representing workers in all sectors in the UK

Question 26 The monitoring and approval arrangements under the GSP+ regime could be greatly strengthened by firstly allowing other parties to provide additional information on compliance that complements monitoring bodies, and secondly making monitoring processes more transparent. The procedural arrangements for monitoring compliance and approving applications of GSP+ beneficiaries should be amended to allow stakeholders with a demonstrable interest in the matter, such as trade unions or human rights organisations, to submit relevant information on the question of effective implementation. This is important for several reasons.

Firstly, conclusions from monitoring bodies can be out of date, particularly where events on the ground are moving quickly (e.g. the military coup in Honduras) or fall outside of the reporting cycles of monitoring bodies. When countries apply to join GSP+ often the reports from monitoring bodies are out of date.

Secondly, some conventions do not have monitoring bodies allied with them.

Thirdly, many monitoring bodies report against their own criteria which do not necessary fit with the EU's test of "effective implementation".

Fourthly, allowing third party submission would be adopting best practice on obtaining the views of civil society, in line with similar processes, increasing public confidence in the system. None of this is to duplicate or undermine the role of the ILO, which has the clear mandate for setting and monitoring the application of labour standards.

Additionally, the Commission can play an enhanced role in monitoring and approval through the creation of specialist Labour Attache posts (including some staff drawn from European social partners' organisations) in EU delegations under the new External Action Service, tasked with ensuring coherence with the ILO and EU Human Rights dialogue processes and monitoring and benchmarking national level progress on effective implementation. They could also play the central role in ensuring EC technical assistance is best targeted to assist national governments in reaching benchmarks.

Further, there are other GSP schemes and FTAs which have their own monitoring processes - for example, the United States, through its US Trade Representative conducts its own monitoring and approval processes for GSP beneficiaries. Coordinating with these other schemes or mechanisms would greatly increase the effectiveness of both monitoring, and with coordinated leverage, improvements in implementation. The best way to drive such coherence in the longer term would be through the formation within the WTO of a working party on trade, globalisation, development and decent work, with a key role for the ILO - a long standing demand of the international trade union movement. Transparency in monitoring is an area that needs urgent reform.

For trade unions, it is not clear what information the Commission considers in approving applications or monitoring, nor how it uses that information. Concerns about transparency are shared by many member states and also called for in a recent draft opinion of the Committee on Employment and Social Affairs for the Committee on International Trade (see 2009/2219(INI)). As a basic principle, the Commission should list and publish what information it is considering, what decision it has arrived at, and the reasons for that decision, before the approval of applications.

The applications from countries applying or seeking renewal of their GSP+ status should also be made public. Consideration should also be given to what role the Vienna-based Fundamental Rights Agency could play in monitoring and enforcement and ensuring coherence in EU approaches. **Question 27** The Commission currently adopts an informal approach of requiring beneficiary countries to demonstrate continual improvements in implementation. However, without clear benchmarks measuring improvement, and with a lack of transparency of this process, it can be difficult for trade unions to see such improvements and have confidence in the system.

To address these problems the revised regulation should firstly, capture this requirement of "continuous improvement" by reference to existing monitoring systems and especially the ILO supervisory system, including reference to using observations by the Committee of Experts which, read carefully, indicate various stages of progress, standstill or backsliding. Secondly,

the Commission should develop a clear system of benchmarks to monitor, drive and demonstrate progress.

The ILO is currently developing “Decent Work” Indicators, which will include benchmarks for quantifying progress in the application of the core labour standards.

The Commission could revise the GSP regulation to ensure that it considers such benchmarking in making assessments of effective implementation, while recognising that not all principles of conventions can be easily quantified and that qualitative measures of progress will also remain relevant.

Q28: What alternatives or complements, if any, to the criterion of “effective implementation” of international standards in these fields might be relevant for the support of sustainable development and good governance through the GSP+ scheme?

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Keine Alternativen bekannt; Voraussetzung ist, dass internationale Vereinbarungen oder Normen existieren, auf die Bezug genommen wird, sodass die Regelungsinhalte außer Diskussion stehen

a no profit organisation

Austria

trade policy

Having been disappointed in a range of recent GSP+ cases, trade unions support a much clearer definition of what is meant by “effective implementation”, and a transparent process for deciding when a country has met, or has failed to meet that definition. In practice, the European Commission has interpreted “effective implementation” to mean that a beneficiary country is “continually improving”. While trade unions support the idea of encouraging continuous improvement, this should be a complement to the idea of effective implementation, not a substitute for it. After all, a systematic violator of trade union rights could be improving, but still fail to meet a test of “effectively implementing”.

To re-mediate this, beneficiary countries on the GSP+ regime should be able to demonstrate, in addition to maintaining the ratification of the conventions and their implementing legislation and measures:

- A basic level of implementation, additionally including effective enforcement of the rights in the international conventions through a judicial system respecting the rule of law, and the adequate resourcing of systems of labour inspection.
- That the conclusions of the relevant monitoring bodies show material progress in implementing the Annex III conventions as benchmarked (also see answer question 27); and
- That it is not perpetrating, sanctioning, failing to prevent, ignoring or otherwise causing individual or repeated gross violations of the conventions.
- That it is not failing to co-operate with the monitoring bodies in the manner required under the conventions.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

EU SHOULD REGULARLY VISIT THOSE INDUSTRIES IN THE POOR COUNTRIES WHO ARE USING GSP. THEY CAN CHECK IF THEY ARE PASSING BENEFITS TO THE POORER SEGMENTS OF THE COUNTRY. GOVERNMENTS WILL BE ENCOURAGED TO DO BETTER GOVERNANCE AND REDUCE POVERTY BUT THERE MUST NOT BE ANY COMPULSION AS LOCAL GOVERNMENTS KNOW WHAT IS BEST FOR THEM

a business association

Belgium

Cocoa sector

The criterion of ratification and effective implementation of 27 international conventions could encourage GSP+ beneficiary countries' sustainable development and good governance. Nevertheless the implementation costs of some of these conventions can be very high. Therefore, GSP+ scheme could be reinforced with additional development funds (e.g. Aid for Trade) aimed at supporting the implementation of these conventions after GSP+ countries ratified them.

a business association

BELGIUM

NITROGEN FERTILIZERS

With climate change the following factors need to be considered: 1) adhesion to international consensus agreements and future treaty 2) adhesion to ETS 2013 scheme or linkage to it; 3) exclusion from GSP rights upon refusal to recognise and or participate in the international climate change treaty.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

Effective implementation is sufficient.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

No specific comments.

a business association

Belgium

Trade association: Man-made fibres

No comment

a business association

Belgium

Textiles & Clothing

It is evident that if a country is cited in the news and in official reports from international organizations as being violating international conventions and rules which are the basis for obtaining GSP+ this country is clearly not implementing the Conventions. As said before EU Delegations have an important role in this area.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

The GSP as a system for development is still needed for the beneficiary countries to receive technical assistance or development cooperation to deal with the system and its rules of origin and the upcoming demand of registered exporters etc. This could be done by a follow-up system through country reports (both in-country and analysis) from the European Commission and the beneficiary country, where the developing country could identify problems and receive assistance. There is Aid for Trade and IF and EDF plus the national technical assistance.

a business association

Belgium

Representing the foreign trade interests of European retail trade

As far as not all criteria are fulfilled serious efforts to reach the goal should be sufficient.

a company

Belgium

Import of food items

the actual GSP system is completely to the detriment of the poor and developing countries of origin, violating also and at the same time all major parameters at their side : sustainability, durability, good governance, cost of life, working conditions, etc

a no profit organisation
Belgium
Agricultural and Agrifood Trade
No comment.

a no profit organisation
Belgium
trade union

Having been disappointed in a range of recent GSP+ cases, trade unions support a much clearer definition of what is meant by “effective implementation”, and a transparent process for deciding when a country has met, or has failed to meet that definition. In practice, the European Commission has interpreted “effective implementation” to mean that a beneficiary country is “continually improving”. While trade unions support the idea of encouraging continuous improvement, this should be a complement to the idea of effective implementation, not a substitute for it. After all, a systematic violator of trade union rights could be improving, but still fail to meet a test of “effectively implementing”.

To remedy this, beneficiary countries on the GSP+ regime should be able to demonstrate, in addition to maintaining the ratification of the conventions and their implementing legislation and measures:

- A basic level of implementation, additionally including effective enforcement of the rights in the international conventions through a judicial system respecting the rule of law, and the adequate resourcing of systems of labour inspection.
- That the conclusions of the relevant monitoring bodies show material progress in implementing the Annex III conventions as benchmarked (also see answer question 27); and
- That it is not perpetrating, sanctioning, failing to prevent, ignoring or otherwise causing individual or repeated gross violations of the conventions.
- That it is not failing to co-operate with the monitoring bodies in the manner required under the conventions.

other
Belgium

Representing working people in all sectors throughout Europe ---- European Trade Union Confederation

Having been extremely disappointed in a range of recent GSP+ cases, the ETUC supports a much clearer definition of what is meant by “effective implementation”, and a transparent process for deciding when a country has met, or has failed to meet that definition. In practice, the European Commission has interpreted “effective implementation” to mean that a beneficiary country is “continually improving”. While we support the idea of encouraging continuous improvement, this should be a complement to the objective of effective implementation, and not a substitute for it. A systematic violator of trade union rights could be improving, but still fail to meet a test of “effectively implementing”.

To remedy this, beneficiary countries on the GSP+ regime should be able to demonstrate, in addition to maintaining the ratification of the conventions and their implementing legislation and measures:

- A basic level of implementation, additionally including effective enforcement of the rights in the international conventions through a judicial system respecting the rule of law, and the adequate resourcing of systems of labour inspection.
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- That it is not failing to co-operate with the monitoring bodies in the manner required under the conventions.

other
Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)
CSC supports a much clearer definition of what is meant by "effective implementation" and a transparent process for deciding when a country has met, or has failed to meet that definition. In practice, the European Commission has interpreted "effective implementation" to mean that a beneficiary country is "continually improving". While we support the idea of encouraging continuous improvement, this should be a complement to the objective of effective implementation, and not a substitute for it. A systematic violator of trade union rights could be improving, but still fail to meet a test of "effectively implementing".

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- That it is not perpetrating, sanctioning, failing to prevent, ignoring or otherwise causing individual or repeated gross violations of the conventions.
- That it is not failing to co-operate with the monitoring bodies in the manner required under the conventions.

other

Belgium

advising our members, interest representation ---- Cefic

EBA

a company

Cambodia

Export

No comment.

a business association

Ecuador

Ecuadorian Exportes Federation

Los proyectos y programas de cooperación que mantiene la UE hacia los países beneficiarios del SGP+ deben guardar coordinación con los objetivos que se persiguen al tener condicionamientos que en principio apuntan a fortalecer los esfuerzos hacia un desarrollo sostenible y buena gobernanza.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

In order to develop a comprehensive policy to support sustainable development and good governance, it would be useful to enhance the objectives of the regime for including non reimbursable economic and technical co-operation.

a no profit organisation

Germany

trade union

The criterion of effective implementation has to be maintained. The decision whether this criterion has been achieved or not should be much more transparent. Trade unions and other organization have to be asked to submit their opinion and comment the reports that have been tabled by the applying countries. The EU should work on indicators that measure the effective implementation of a standard. The improvement of a situation, as it has been argued in the case of Colombia in the past, should not be equivalent to the criterion "effective implementation".

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).
Please see the previous questions.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

Please see the previous questions.

a no profit organisation

India

Research in International Economic Relations

No comments in view of the general response to Q 21, challenging the appropriateness of this component of the EU GSP.

other

INDIA

TRADE POLICY ---- GOVERNMENT OF INDIA

Setting up and maintain administrative structure

(A) In the legal text, many articles use a phrase necessary structures or support without elaborating what it exactly means. For the sake of uniformity it would be helpful if such words are defined in detail. For example, Article 68.1 (a) mentions putting up in place and to maintain the necessary national and regional administrative structures and systems required for the implementation and the management of the rules and procedures. Similarly, Article 68.2 (a) mentions providing all necessary support in the event of a request by the commission for the monitoring by it of the proper management of the scheme of the country concerned.

(B) The new rules talk about punitive action in case of non compliance on the part of beneficiary countries. The new rules mandate that the GSP availing countries will have to submit undertaking to the commission in this regard and if any country (Article 74.4) fails to comply with the undertaking its name may be withdrawn from the beneficiary country list. The phrase defining the compliance parameters needs to be elaborated.

(C) Process of registration is mentioned in Article 89, 90 and 91. Article 91 mentions that name of the exporters who no longer meet the conditions for exporting goods should be removed from the record of a registered exporter of the GSP beneficiary country upon information by him to the registering authority. It is not clear if the name of multi product exporters needs to be removed from the register if he does not meet the condition for exporting one product under the scheme but continues getting GSP benefits for the other products.

(D) The new database set up will add up to the cost of the government and the exporters.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

No comment

a company

Malaysia

Manufacturing

not sure

a company

Myanmar

Information Supply

Not sure

a company

Qatar

Liquified Natural Gas

Outcome-based reviews into the overall effect of the implementation of sustainable development and good governance measures in specific countries.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 28. Let the “owner” of the respective convention report on the fulfilment of them. Let the international political system deal with it. It has basically not anything to do with trade.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

N/A

a citizen

UK

Private

There should be an independent international inquiry into possible war crimes in Sri Lanka. Otherwise permanently withdrew the GSP+ for Sri Lanka.

a company

UK

Import and Distribution

once again, something that encourages more of an ecologically sound focus

other

UK

Multi sector trade union - public services, manufacturing and commercial services ---- trade union

In recent years, a number of serious and well documented concerns and complaints about human rights, trade union rights and freedoms and labour standards have been raised by trade unions and NGO's in countries benefitting from GSP+ status (Colombia, Costa Rica), yet have been effectively ignored. There needs to be a much clearer definition of what is meant by “effective implementation”, and a transparent process for deciding when a country has met, or has failed to meet that definition.

The European Commission has interpreted “effective implementation” to mean that a beneficiary country is “continually improving”. While trade unions support the idea of encouraging continuous improvement, this should be a complement to the idea of effective implementation, not a substitute for it. After all, a systematic violator of trade union rights could be improving, but still fail to meet a test of “effectively implementing”.

To remedy this, beneficiary countries on the GSP+ regime should be able to demonstrate, in addition to maintaining the ratification of the conventions and their implementing legislation and measures:

- A basic level of implementation, additionally including effective enforcement of the rights in the international conventions through a judicial system respecting the rule of law, and the adequate resourcing of systems of labour inspection.

- That the conclusions of the relevant monitoring bodies show material progress in implementing the Annex III conventions as benchmarked (see answer question 27); and

- That it is not perpetrating, sanctioning, failing to prevent, ignoring or otherwise causing individual or repeated gross violations of the conventions.

- That it is genuinely co-operating with the monitoring bodies in the manner required under the conventions.

a business association

United Kingdom

Seafood importation

No comment

a no profit organisation

United Kingdom

Representing workers in all sectors in the UK

Having been extremely disappointed in a range of recent GSP+ cases, the TUC supports a much clearer definition of what is meant by “effective implementation”, and a transparent process for deciding when a country has met, or has failed to meet that definition. In practice, the European Commission has interpreted “effective implementation” to mean that a beneficiary country is “continually improving”. While we support the idea of encouraging continuous improvement, this should be a complement to the objective of effective implementation, and not a substitute for it. A systematic violator of trade union rights could be improving, but still fail to meet a test of “effectively implementing”.

To remedy this, beneficiary countries on the GSP+ regime should be able to demonstrate, in addition to maintaining the ratification of the conventions and their implementing legislation and measures:

a basic level of implementation, additionally including effective enforcement of the rights in the international conventions through a judicial system respecting the rule of law, and the adequate resourcing of systems of labour inspection;

that the conclusions of the relevant monitoring bodies show material progress in implementing the Annex III conventions as benchmarked (also see answer question 27);

that it is not perpetrating, sanctioning, failing to prevent, ignoring or otherwise causing individual or repeated gross violations of the conventions;

and that it is not failing to co-operate with the monitoring bodies in the manner required under the conventions.

Q29: Under Everything But Arms (EBA), the EU has fully implemented the goal of full duty-free, quote-free access for all products from all Least-Developed Countries (only 23 tariff lines, covering arms and armaments are excluded). Are there any other ways to enhance the value of this preferential access to the LDCs?

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Keine Änderungen der derzeitigen EBA-Regelungen erforderlich

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

NO THIS IS EASY AND BEST PROCESS. THE ONLY THING CONFUSING HERE IS THE LOCAL CONTENT CRITERIA WHICH M=NOW MUST BE REMOVED. LET THEM PRODUCT IN WHATSOEVER WAY THEY CAN.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

Enhance the value of these full preferences by excluding high-income countries from the GSP. Simplify Rules of Origin requirements for LDCs to allow for regional cumulation for the countries that are eligible for the Everything But Arms scheme. Beyond the GSP, the EU should focus its development assistance on aid-for-trade (e.g. infrastructure projects, customs facilities, compliance with EU standards); as well as private sector involvement in trade related matters, e.g. through capacity development of private sector business intermediary organizations;

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

The only efficient way to ensure that those countries which need it the most do enjoy the benefits of the preference is to exclude high-income and emerging economies from the scheme.

a business association

Belgium

Trade association: Man-made fibres

No

a business association

Belgium

Textiles & Clothing

The EBA framework should be retained as it is in the current regime. . A few capacity building actions might be envisaged to ensure a better utilization rate from the part of some LDCs especially ACP countries.

a business association

Belgium

EUROCHAMBRES, the Brussels-based Association of European Chambers of Commerce and Industry EUROCHAMBRES is the sole European body that serves the interests of every sector and every size of European business and the only one so close to business. EUROCHAMBRES has member organizations in 45 countries representing a network of 1,700 regional and local Chambers with over 19.8 million member companies. Chamber members employ over 120 million employees.

EBA is an accurate and straightforward system for the least developed countries, which the EU should continue to develop. In comparison to the EBA the general GSP does not cover all products and gives different preferential benefits depending on the product. To simplify the EBA-certificate it could for example be replaced by an invoice declaration. Moreover, we suggest that the EC makes available in the online "Export Helpdesk for Developing Countries" information about the EBA in as many languages and user-friendly as possible, especially taking into consideration SMEs needs.

a business association

Belgium

The CEFS (Comité Européen des Fabricants de Sucre) represents all European sugar manufacturers and refiners among the European Institutions (Council of Ministers, European Commission, European Parliament, Economic and Social Committee, etc.) and among different international organisations (FAO,WTO,etc.)-Since December 2009 CEFS is registered as interest representative (Identification number in the register: 49679062863-35). .

A: See reply to Q6.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

The EBA scheme works generally well; to enhance its attractiveness even more the EU could further strengthen its focus on the essentials of the GSP: a simple system, stability and one year predictability. In addition, the EU could make available information on EBA and on the other elements of the GSP in more languages, more user-friendly and more tailor-made for SMEs than so far, especially in the framework of the online Export Helpdesk for Developing Countries. This tool has already proven to be of great help for the application of the GSP, both by EU importers and developing country exporters. On top of English, French, Spanish and Portuguese, the Commission could well consider adding further languages, including other than EU official languages.

a business association

Belgium

Representing the foreign trade interests of European retail trade

No, since for least developed countries a one-step processing in the textile sector is sufficient.

a citizen

Belgium

Finance

No

a no profit organisation

Belgium

Development NGO

Simplify the rules of origin, help to meet technical and sanitary and phyto-sanitaire standards

a no profit organisation

Belgium

Agricultural and Agrifood Trade

Considering the fact that for some countries under the EBA scheme, the EU is currently negotiating Economic Partnership Agreements (EPAs), a coordination of the preferences granted to countries under the EBA and EPA schemes has to be ensured, as preferences in the EBA are quota free and duty free while the EPAs scheme has quota and MFN duties for certain products.

a no profit organisation

Belgium

Economic justice

To increase the efficacy of the EBA programme the terms of the Rules of Origin should be modified and made more favourable for LDCs, and Aid for Trade should be increased beyond what is already foreseen in the EDF in order to allow the LDCs to overcome the structural gap, which impedes their access to the European market.

a no profit organisation

Belgium

COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

For most countries under the EBA scheme the EU is currently negotiating Economic and Partnership Agreements. A coordination of the preferences given, which in one system appear quota free while for the other impose a quota for certain products, is required.

other

Belgium

advising our members, interest representation ---- Cefic

Not only tariffs are obstacles to exports for LDCs, there are also non-tariff barriers, such as legislation on health, consumer and environmental protection. Possibilities, as they can be taken within LDC, are fully exhausted.

a no profit organisation

Belgium, Brussels

leather sector. COTANCE represents interests of National Associations of Tanners and Dressers

Yes, by reducing the benefits of the GSP to more competitive developing countries so that for particular products they are not on a level playing field but that LDCs effectively benefit a competitive advantage.

a citizen

Cambodia

Garment Industry

The role of origin should be more simple and easy to apply for it

a company

Cambodia

Export

As mentioned above, Cambodia would like the EU to reduce the current practice of local content from 49% to around 25%. The EU should consider and treat the sugar price as its most special GSP granted to 49 LDCs.

a business association

Ecuador

Ecuadorian Exportes Federation

No se contesta esta pregunta.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

No answer.

a business association

France

MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies

LDCs exports also face non-tariff obstacles such as health, phyto-sanitary or environmental protection. EU should help them to better understand, use, practice and implement these standards through technical assistance, transfer of technology or training programs. It could allow LCDs to develop competitive advantages for their products.

a company

Germany

Think-tank for European and international economy and governance

no. of tariff lines could increase considerably, should also include (more) agricultural products

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

Not only tariffs are obstacles to exports for LDCs, there are also non-tariff barriers, such as legislation on health, consumer and environmental protection. Possibilities, as they can be taken within LDC, are fully exhausted.

a no profit organisation

India

Research in International Economic Relations

For many LDCs lacking in supply base the EBA programme is yet to become relevant. Trade related aid helps to some extent but what is required is improvement of their social and physical infrastructure and setting up of institutions, without which the countries cannot expand their agricultural and industrial production. ODA and finance from the international financial institutions should be used for these purposes.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

I cannot think of any

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

Preferential access to the LDCs could only be ensured by avoiding preference erosion, i.e. deepening of preferences to the non-LDCs. See also answer to Q30.

a company

Malaysia

Export Pepper

Nil

a company

Myanmar

Information Supply

Yes by not linking GSP as a tool to punish nations. especially those that effect the poorest of the poor.

a business association

Portugal

Textile and Clothing Industry

The EBA framework should be retained as it is in the current regime. A few capacity building actions might be envisaged to ensure a better utilization rate from the part of some LDCs especially ACP countries.

a company

Qatar

Liquified Natural Gas

No comment.

a business association

Sweden

The Association of Swedish Chambers of Commerce representing Swedish companies. The Swedish Chambers of Commerce are regional, independent, non-profit making organizations, funded by the members.

EBA is an accurate and straightforward system for the least developed countries, which the EU should continue to develop. In comparison to the EBA the general GSP does not cover all products and gives different preferential benefits depending on the product. To simplify the EBA-certificate it could for example be replaced by an invoice declaration. Moreover, we suggest that the EC makes available in the online "Export Helpdesk for Developing Countries" information about the EBA in as many languages and user-friendly as possible, especially taking into consideration SMEs needs.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 29. Simplify the origin requirements as we have suggested many times before and also above. Stop bully LDC:s. Why should not the poorest countries be allowed to export arms under the GSP? They are not responsible enough? Not mature enough? Not peaceful enough compared to us? Not that it matters much; arms for military use are since long time duty free.

other

Switzerland

Policy research and negotiation assistance ---- International organization

Yes, support the Rules of Origin proposal from LDCs in WTO. Provide preferential treatment to LDCs in non-tariff barriers. For example, a ban in import licenses, appropriate consultation mechanism in discussing standards, etc.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

N/A

a citizen

UK

Economic research

Extend to services, including Mode IV

a no profit organisation

UK

Development Education, campaigns + advocacy

A recent study (Global Financial Integrity: Illicit financial flows from Africa) has highlighted the problem of outflows from DCs as a result of opaque tax accounting procedures. Currently, under 'Donor Country Content' rules, where an EU company outsources the assembly of a product to a

DC, it can be exported back into the EU under GSP conditions. In order to assist the LDC government's revenue collection, EU companies availing of donor country content procedures in DCs should be obliged to publish accounts on a country-by-country basis. This transparency would help the DC to claim legitimate taxes on profits generated, thus enhancing the value of EBA access.

a business association
United Kingdom
Seafood importation
No comment

Q30: Should EBA treatment be extended to any other beneficiaries of the GSP? If so, what general horizontal indicators or criteria should be used to identify those non-LDCs whose developmental needs and situations would be such as to indicate a genuine need to benefit from such improved access?

a business association
Austria
representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members
Keine generelle Erweiterung der EBA-Begünstigungen auf andere APS-Länder, da ansonsten zB die APS+-Präferenzen ausgehöhlt und bedeutungslos werden. Generelle Zollfreiheit muss weiterhin an besondere Voraussetzungen geknüpft werden: Least-Developed Country-Status oder APS+- Anreiz; andernfalls entfielen entweder die besondere Förderung der ärmsten Länder bzw. die Belohnung der sozial-engagierten Länder, was in beiden Fällen nicht wünschenswert wäre.

a business association
BANGLADESH
INDUSTRY AND BUSINESS CHAMBER ACTIVITIES
NO NEED.

a business association
Belgium
representing interests of companies of all sizes and sectors of activity in Europe
No, this would present difficult definition/criteria problems

a business association
Belgium
To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance
No.

a business association
Belgium
Trade association: Man-made fibres
No

a business association
Belgium
to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry
No

a business association

Belgium

Textiles & Clothing

The EBA treatment should not be extended to other GSP beneficiaries.

a business association

Belgium

EUROCHAMBRES, the Brussels-based Association of European Chambers of Commerce and Industry EUROCHAMBRES is the sole European body that serves the interests of every sector and every size of European business and the only one so close to business. EUROCHAMBRES has member organizations in 45 countries representing a network of 1,700 regional and local Chambers with over 19.8 million member companies. Chamber members employ over 120 million employees.

It is important to have clear rules for eligibility to GSP status, and we believe that the current system of UN classification should be kept. However, EBA could be an important tool for development if opened for instance to Lower Income Countries.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

Geographically, the GSP covers well the developing world. The decision on EBA treatment should exclusively be based on objective development criteria.

a business association

Belgium

Representing the foreign trade interests of European retail trade

Yes, in special cases the overall economic situation could be a criterion for EBA treatment.

a citizen

Belgium

Finance

No

a no profit organisation

Belgium

Development NGO

EBA should be extended to por DCs. For criteria see above

a no profit organisation

Belgium

Agricultural and Agrifood Trade

No comment.

a no profit organisation

Belgium

Economic justice

The EBA system should be extended to those non-LDCs from the ACP region, which do not wish to enter into a free trade agreement in order to protect their local economy from the influx of cheap imports, in line with the American AGOA programme, which involves also non-LDCs. In particular the EBA scheme should also be extended to those African non-LDCs, like Kenya, which are in a customs union with LDCs in order to support the functioning of the customs union.

other

Belgium

advising our members, interest representation ---- Cefic

No; extending the circle of EBA beneficiaries to non-LDCs would automatically reduce the value of this instrument for LDCs. It is worth noting that LDCs are those countries which really need duty-free access. Temporary withdrawal instruments, safeguard measures, antifraud measures

a company

Cambodia

Export
No comment.

other
Ecuador
Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador
Existing criteria should be maintained.

a business association
Finland
Trade Policy
No

a company
Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.
Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products
No.

a business association
France
MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies
EBA must be only restricted to LDCs as defined by the World Bank.

a business association
Germany
Industry
No; extending the circle of EBA beneficiaries to non-LDCs would automatically reduce the value of this instrument for LDCs. It is worth noting that LDCs are those countries which really need duty-free access.

a company
Germany
Think-tank for European and international economy and governance
if GSP could be linked to EBA principles, it would be welcome - I think at both sides

a company
Germany
No.

other
Germany
advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers
No; extending the circle of EBA beneficiaries to non-LDCs would automatically reduce the value of this instrument for LDCs. It is worth noting that LDCs are those countries which really need duty-free access.

a no profit organisation
India
Research in International Economic Relations
It is best to keep the EBA programme limited to the LDCs.

other
Italy
SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

Yes it should be extended to transition economies.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

No, EBA treatment should not be extended to the non-LDCs in order to avoid preference erosion for LDC's.

a company

Malaysia

Export Pepper

No comments

a company

Malaysia

Manufacturing

yes.Per capita income

other

Mauritius

International Trade ---- Government official

No countries having acheived a level of competitiveness in specific sectors should be graduated out.

a company

Myanmar

Information Supply

Yes review Myanamr status.

a company

Qatar

Liquified Natural Gas

No comment.

a company

Qatar

Chemicals and Petrochemicals

Regular audits.

a business association

Sweden

The Association of Swedish Chambers of Commerce representing Swedish companies. The Swedish Chambers of Commerce are regional, independent, non-profit making organizations, funded by the members.

It is important to have clear rules for eligibility to GSP status, and we believe that the current system of UN classification should be kept. However, EBA could be an important tool for development if opened for instance to Lower Income Countries.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 30. We suggest that LDC:s and countries eligible for GSP Plus should be treated in the same way; simple origin requirements and 0 duties.

other

Switzerland

Policy research and negotiation assistance ---- International organization

A horizontal indicator could be: countries part of a customs union in which 50% of more of the members is a LDC. Such countries should receive EBA treatment, as they are regionally integrate with LDCs.

other
Thailand
Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of
Commerce
N/A

a citizen
UK
Economic research
Yes, to all.

a no profit organisation
UK
Development Education, campaigns + advocacy
EBA region neighbouring countries, where those countries are close to meeting LDC criteria, should be included to promote regional development. In particular, all countries in sub-Saharan Africa should be eligible for EBA. As a priority, Cote d'Ivoire, Ghana and Kenya should be brought under EBA regime, for two reasons: these are countries surrounded by EBA countries, so that the exports of the whole region would be boosted; and they are in a slightly better position than some of their neighbours to make the best of market access, again driving a rise in regional exports. Approving such countries for EBA would stimulate the economy of the region as a whole. Moreover, regional cumulation should be extended to other African countries.

a business association
United Kingdom
Seafood importation
No comment

Q31: Are "safeguard" type instruments relevant for the GSP scheme?

a business association
Argentina
Argentine Oil Industry Chamber
Considering the limited period of validity and that there are temporary withdrawals instruments and products graduations, safeguard instruments should be excluded from the scheme. Nonetheless, in accordance with GSP goals, safeguards should trigger on more restrictive basis than the "common" safeguard measures. In example, the "threaten to cause" injury should not be included as well as the chance to impose provisional safeguard measures. This does suits with the purpose of the regimen and makes it ineffective.

a business association
Argentina
Argentine Biofuels Chamber
Considering the limited period of validity and that there are temporary withdrawals instruments and products graduations, safeguard instruments should be excluded from the scheme. Nonetheless, in accordance with GSP goals, safeguards should trigger on more restrictive basis than the "common" safeguard measures. In example, the "threaten to cause" injury should not be included as well as the chance to impose provisional safeguard measures. This does suits with the purpose of the regimen and makes it ineffective.

a business association
Argentina
Rosario Board of Trade

Considering the limited period of validity and that there are temporary withdrawals instruments and products graduations, safeguard instruments should be excluded from the scheme. Nonetheless, in accordance with GSP goals, safeguards should trigger on more restrictive basis than the “common” safeguard measures. In example, the “threaten to cause” injury should not be included as well as the chance to impose provisional safeguard measures. This does suits with the purpose of the regimen and makes it ineffective.

a business association

Argentina

Buenos Aires Grain Exchange

Considering the limited period of validity and that there are temporary withdrawals instruments and products graduations, safeguard instruments should be excluded from the scheme. Nonetheless, in accordance with GSP goals, safeguards should trigger on more restrictive basis than the “common” safeguard measures. In example, the “threaten to cause” injury should not be included as well as the chance to impose provisional safeguard measures. This does suits with the purpose of the regimen and makes it ineffective.

a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

Considering the limited period of validity and that there are temporary withdrawals instruments and products graduations, safeguard instruments should be excluded from the scheme. Nonetheless, in accordance with GSP goals, safeguards should trigger on more restrictive basis than the “common” safeguard measures. In example, the “threaten to cause” injury should not be included as well as the chance to impose provisional safeguard measures. This does suits with the purpose of the regimen and makes it ineffective.

a business association

Argentina

Bahia Blanca Grain Exchange

Considering the limited period of validity and that there are temporary withdrawals instruments and products graduations, safeguard instruments should be excluded from the scheme. Nonetheless, in accordance with GSP goals, safeguards should trigger on more restrictive basis than the “common” safeguard measures. In example, the “threaten to cause” injury should not be included as well as the chance to impose provisional safeguard measures. This does suits with the purpose of the regimen and makes it ineffective.

a no profit organisation

Argentina

Export services

Considering the limited period of validity and that there are temporary withdrawals instruments and products graduations, safeguard instruments should be excluded from the scheme.

a no profit organisation

Argentina

Research on international Negotiations

Considering the limited period of validity and that there are temporary withdrawals instruments and products graduations, safeguard instruments should be excluded from the scheme. Nonetheless, in accordance with GSP goals, safeguards should trigger on more restrictive basis than the “common” safeguard measures. In example, the “threaten to cause” injury should not be included as well as the chance to impose provisional safeguard measures. This does suits with the purpose of the regimen and makes it ineffective.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Entendemos que no se justifica prever una cláusula de salvaguardia para un régimen de estas características toda vez que: -las preferencias otorgadas por cada nuevo reglamento tienen una vigencia limitada; -se prevén mecanismos de graduación tanto por país como por producto; y - las preferencias pueden retirarse en cualquier momento para todos o algunos de los productos

procedentes de un país beneficiario. Atento a ello, y en caso de que el nuevo reglamento incluya nuevamente un mecanismo de salvaguardia, entendemos que deberían preverse criterios más estrictos, claros y transparentes para la activación de este instrumento garantizando la excepcionalidad de una medida de esta naturaleza.

a business association

Argentina

Argentine Soybean Chain Association

Considering the limited period of validity and that there are temporary withdrawals instruments and products graduations, safeguard instruments should be excluded from the scheme. Nonetheless, in accordance with GSP goals, safeguards should trigger on more restrictive basis than the "common" safeguard measures. In example, the "threaten to cause" injury should not be included as well as the chance to impose provisional safeguard measures. This does suits with the purpose of the regimen and makes it ineffective.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Haben in der Praxis keine Bedeutung, sollten aber als Möglichkeit für „wirtschaftliche Notfälle“ nicht aufgegeben werden.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

NO NEED OF ANY SAFEGUARD. ANYTHING DONE IN THESE RESPECT MAKE THE GSP WORK LESS EFFECTIVELY

a business association

Belgium

Renewable energies

Given the difficulty to address the maturity of an industry sector through graduation, the safeguard clause should be effectively used as it provides a mean to "graduate" individual CN Codes. A more comprehensive explanation can be found in the EBB position ref. 472/TRA/10 sent to TRADE-GSP-Consultation@ec.europa.eu last June 2nd, 2010.

a business association

BELGIUM

NITROGEN FERTILIZERS

Yes there should be a safeguard measure especially as this could be used for unexpected import surges causing injury to the EU industry.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

Yes. Safeguard type instruments must be made more effective by addressing the effects of GSP benefits in the calculation of trade defence duties, for the duration of the measure.

a business association

Belgium

representation of interests of the EU food and drink industry

The temporary withdrawal, safeguards and antifraud measures are crucial in the GSP to ensure a rapid response in the case of unfair practices or abnormal trade flows.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

Yes, they are provided that the industry is entitled to request it not only on the basis of injury but also threat of injury.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

An appreciation of the relevancy of the safeguard measures is difficult to make since the instrument has yet to be used.

a business association

Belgium

Trade association: Man-made fibres

Only if not politically motivated

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

Yes. In addition, they should be made more effective by allowing industry to request safeguard based on sound justification and evidence of injury or threat of injury.

a business association

Belgium

Textiles & Clothing

In the sense that they can constitute a valuable instrument to react in case of market disruption. The use of a more efficient and swift instrument like the one existing in the EPAs Agreements could be envisaged.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

„Safeguard“ type instruments, if at all, are only needed to protect importers in good faith. It is of utmost importance for importers to rely on a Form A certificate. More details on our position on preferential rules of origin please refer to the EuroCommerce GSP position paper published in July 2009 (page 5-7):

<http://www.eurocommerce.be/media/docs/intrade/GSP2012EuroCommerce.doc> EuroCommerce acknowledges the Commission's current practice of utmost restraint in applying GSP safeguards. In the interest of predictability and legal certainty, the use of any temporary withdrawal instruments etc. should be envisaged only in exceptional cases.

a business association

Belgium

Representing the foreign trade interests of European retail trade

In practice safeguard type instruments were not relevant for the GSP scheme.

a citizen

Belgium

Finance

Yes

a company

Belgium

Import of food items

Now these are used to falsify an economical situation, and in a way we are treating the developing countries by means of a kind of illegal and prohibitive economical " warfare " in which we do " steal " their resources

a no profit organisation

Belgium

Agricultural and Agrifood Trade

CELCAA supports a more stable and predictable safeguard mechanism under the GSP scheme.

a no profit organisation
Belgium
trade
no

a no profit organisation
Belgium
COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.
COCERAL is in favour of a more predictable and stable safeguard mechanism under the GSP scheme.

other
Belgium
advising our members, interest representation ---- Cefic
No safeguard clause procedure is necessary if the graduation mechanism can reflect the real state of development in the future. In fact, the safeguard clause procedure is of very little importance in practice. As there is so far no precedent and experience in using this mechanism, it also seems that companies are reluctant to use this mechanism due to fear for cross-retaliations. As regards chemical products, it is often relatively easy to see which company wants to resort to the safeguard clause - given that there are only few suppliers. Public attention involved with this step is to the disadvantage of the concerned company.

a no profit organisation
Belgium, Brussels
leather sector. COTANCE represents interests of National Associations of Tanners and Dressers
Yes, safeguard measures are crucial for the EU industry

a no profit organisation
Bolivia
Exportaciones
No debería haber mediadas de salvaguardia para el SGP

a no profit organisation
Bolivia
Representación de todos los Despachantes de Aduana de Bolivia.
En un esquema de preferencias arancelarias no debería existir medidas de salvaguardia.

a no profit organisation
Bolivia
industry
There should not be safeguard type instruments for GSP scheme.

other
Bolivia
Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio
No debería haber medidas de salvaguardia para el SGP

a business association
Brazil
industrial sector
Safeguard instruments are not relevant to the GSP, because they reduce the incentives and bring uncertainty to investors, also reducing the development opportunities of GSP.

a company
Cambodia
Export
Yes they are.

a business association

Ecuador

Ecuadorian Exportes Federation

Las salvaguardias y otros mecanismos de defensa comercial no brindan la estabilidad que los beneficiarios necesitan para aprovechar de la mejor manera las preferencias.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

No answer.

a company

Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.

Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products

Yes.

a business association

France

Textile

Yes it's an wellknown instrument.

a business association

Germany

Industry

Safeguard clause procedure might become less relevant if the graduation mechanism better reflects the real state of development in the future. In fact, the safeguard clause procedure is of very little importance in practice. As regards some industrial sectors, it is often relatively easy to see which company wants to resort to the safeguard clause - given that there are only few suppliers. Public attention involved with this step is to the disadvantage of the concerned company.

a company

Germany

chemical sector

No safeguard clause procedure is necessary, if the graduation mechanism can reflect the real state of development in the future. In fact, the safeguard clause procedure is of very little importance in practice. As there is so far no precedent and experience in using this mechanism, it also seems that fear for cross-retaliations is a major issue. With regard to chemical products, it is in addition often relatively easy to see which company wants to apply a safeguard clause - given that there are only few suppliers. Public attention involved with this step is to the disadvantage of the concerned company.

a company

Germany

Think-tank for European and international economy and governance

I dont have enough time to deal with this in detail, sorry

a company

Germany

Yes.

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

No safeguard clause procedure is necessary if the graduation mechanism can reflect the real state of development in the future. In fact, the safeguard clause procedure is of very little importance in practice. As regards chemical products, it is often relatively easy to see which

company wants to resort to the safeguard clause - given that there are only few suppliers. Public attention involved with this step is to the disadvantage of the concerned company.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

Yes, in order to prevent distortions of the EU market, the GSP should consider safeguard measures.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

Yes, in order to prevent distortions of the EU market, the GSP should consider safeguard measures.

a no profit organisation

India

Research in International Economic Relations

No comments on provisions for temporary withdrawal included in Section 1 of Chapter III of the EC GSP Regulation. However, Section 2 needs to be reconsidered as it creates a parallel safeguard clause of a lower order to be invoked when the EU experiences 'serious difficulties' as opposed to 'serious injury'. It would be better to use the general safeguard provision for this purpose.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

Yes

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

Yes, they are relevant to the GSP scheme, because the GSP is dedicated for countries, which are economically underdeveloped and uncompetitive, so as to ensure them with a preferential margin. Imports from the countries, which are competitive enough to injure the EU industry, are also pushing imports from the less competitive GSP beneficiaries away from the EU market

a company

Malaysia

Textile

Yes

a company

Malaysia

Screw, Nut & Washer

Yes

a company

Malaysia

Manufacturing

yes

a company

Malaysia

Manufacturer

yes

other

Malaysia

International trade and industry ---- Ministry of International Trade and Industry Malaysia

No. The current 'temporary withdrawal instruments' and 'safeguard clause' are sufficient to protect the EU producer. To include the 'safeguard' type instruments would be viewed as against the main objectives of GSP scheme and reduce the market access opportunities for beneficiary countries.

other

Mauritius

International Trade ---- Government official

yes.

a company

Myanmar

Information Supply

yes

other

Panamá

Servicio ---- Ministerio de Comercio e Industria de Panamá

Las salvaguardias son instrumentos relevantes para el régimen SGP.

a company

Qatar

Liquified Natural Gas

As a general principle, we agree that there should be safeguards in place to prevent serious difficulties being caused to an EU producer.

a business association

Spain

Fisheries

Yes, indeed.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 31. No, no need.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

Thailand is of the view that safeguard measures are rather irrelevant for the GSP scheme since the graduation mechanism is already in place such that preferences are to be withdrawn from products that reach certain level of competitiveness.

a citizen

UK

Private

Yes - The European Commission's December 2009 investigation found that Sri Lanka has been significantly failing to implement the UN human rights conventions that qualify countries for GSP+.

a citizen

UK

Economic research

No.

a company
UK
Import and Distribution
yes

a business association
United Kingdom
Seafood importation
Safeguard type instruments are relevant in the context of protecting importers acting in good faith, especially with reference to certificates of origin of imported goods.

Q32: Should any of the current "temporary withdrawal instruments" (eg for cases of fraud, unfair trading practices, goods made by prison labour etc) be reinforced or rather relaxed and if so in which way? Should any new instruments be included?

a business association
Argentina
Argentine Oil Industry Chamber
On the one hand, it should be clarified the term "competent WTO body" related to "unfair trading practices" (art. 15.1 d of current Regulation). The said because those practices are included in WTO agreements requiring certain findings from the competent domestic authorities. The only WTO body with legal authority to make findings on WTO regulated measures is the Dispute Settlement Body (DSB). Other WTO instances (TPR, Committees) have no legal authority about WTO non compliance claims, according WTO agreements. On the other hand, it should be considered a warnings system, previously to the decision of starting an investigation, with the purpose to justify that the non compliance is systematic and repetitive.

a business association
Argentina
Argentine Biofuels Chamber
On the one hand, it should be clarified the term "competent WTO body" related to "unfair trading practices" (art. 15.1 d of current Regulation). The said because those practices are included in WTO agreements requiring certain findings from the competent domestic authorities. The only WTO body with legal authority to make findings on WTO regulated measures is the Dispute Settlement Body (DSB). Other WTO instances (TPR, Committees) have no legal authority about WTO non compliance claims, according WTO agreements. On the other hand, it should be considered a warnings system, previously to the decision of starting an investigation, with the purpose to justify that the non compliance is systematic and repetitive.

a business association
Argentina
Rosario Board of Trade
On the one hand, it should be clarified the term "competent WTO body" related to "unfair trading practices" (art. 15.1 d of current Regulation). The said because those practices are included in WTO agreements requiring certain findings from the competent domestic authorities. The only WTO body with legal authority to make findings on WTO regulated measures is the Dispute Settlement Body (DSB). Other WTO instances (TPR, Committees) have no legal authority about WTO non compliance claims, according WTO agreements. On the other hand, it should be considered a warnings system, previously to the decision of starting an investigation, with the purpose to justify that the non compliance is systematic and repetitive.

a business association

Argentina

Buenos Aires Grain Exchange

On the one hand, it should be clarified the term “competent WTO body” related to “unfair trading practices” (art. 15.1 d of current Regulation). The said because those practices are included in WTO agreements requiring certain findings from the competent domestic authorities. The only WTO body with legal authority to make findings on WTO regulated measures is the Dispute Settlement Body (DSB). Other WTO instances (TPR, Committees) have no legal authority about WTO non compliance claims, according WTO agreements. On the other hand, it should be considered a warnings system, previously to the decision of starting an investigation, with the purpose to justify that the non compliance is systematic and repetitive.

a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

On the one hand, it should be clarified the term “competent WTO body” related to “unfair trading practices” (art. 15.1 d of current Regulation). The said because those practices are included in WTO agreements requiring certain findings from the competent domestic authorities. The only WTO body with legal authority to make findings on WTO regulated measures is the Dispute Settlement Body (DSB). Other WTO instances (TPR, Committees) have no legal authority about WTO non compliance claims, according WTO agreements. On the other hand, it should be considered a warnings system, previously to the decision of starting an investigation, with the purpose to justify that the non compliance is systematic and repetitive.

a business association

Argentina

Bahia Blanca Grain Exchange

On the one hand, it should be clarified the term “competent WTO body” related to “unfair trading practices” (art. 15.1 d of current Regulation). The said because those practices are included in WTO agreements requiring certain findings from the competent domestic authorities. The only WTO body with legal authority to make findings on WTO regulated measures is the Dispute Settlement Body (DSB). Other WTO instances (TPR, Committees) have no legal authority about WTO non compliance claims, according WTO agreements. On the other hand, it should be considered a warnings system, previously to the decision of starting an investigation, with the purpose to justify that the non compliance is systematic and repetitive.

a no profit organisation

Argentina

Export services

On the one hand, it should be clarified the term “competent WTO body” related to “unfair trading practices” (art. 15.1 d of current Regulation). The said because those practices are included in WTO agreements requiring certain findings from the competent domestic authorities. The only WTO body with legal authority to make findings on WTO regulated measures is the Dispute Settlement Body (DSB). Other WTO instances (TPR, Committees) have no legal authority about WTO non compliance claims, according WTO agreements. On the other hand, it should be considered a warnings system, previously to the decision of starting an investigation, with the purpose to justify that the non compliance is systematic and repetitive. There is no need to include any new instruments on temporal withdrawal.

a no profit organisation

Argentina

Research on international Negotiations

On the one hand, it should be clarified the term “competent WTO body” related to “unfair trading practices” (art. 15.1 d of current Regulation). The said because those practices are included in WTO agreements requiring certain findings from the competent domestic authorities. The only WTO body with legal authority to make findings on WTO regulated measures is the Dispute Settlement Body (DSB). Other WTO instances (TPR, Committees) have no legal authority about WTO non compliance claims, according WTO agreements. On the other hand, it should be considered a warnings system, previously to the decision of starting an investigation, with the purpose to justify that the non compliance is systematic and repetitive.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Consideramos importante que se especifique, en el caso de prácticas comerciales desleales - artículo 15 d) del Reglamento (CE) N° 732/2008-, la frase "...la aplicación del presente artículo se basará en una resolución previa del órgano competente de dicha Organización" (en referencia a la OMC). Debería aclararse que "órgano competente" se refiere al Órgano de Solución de Diferencias, dado que es el único órgano de la OMC que puede pronunciarse en relación al incumplimiento o no de las obligaciones previstas en sus Acuerdos.

a business association

Argentine

Argentine Soybean Chain Association

On the one hand, it should be clarified the term "competent WTO body" related to "unfair trading practices" (art. 15.1 d of current Regulation). The said because those practices are included in WTO agreements requiring certain findings from the competent domestic authorities. The only WTO body with legal authority to make findings on WTO regulated measures is the Dispute Settlement Body (DSB). Other WTO instances (TPR, Committees) have no legal authority about WTO non compliance claims, according WTO agreements. On the other hand, it should be considered a warnings system, previously to the decision of starting an investigation, with the purpose to justify that the non compliance is systematic and repetitive.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Wichtig wäre auch hier, dass die Rücknahme von Begünstigungen (APS generell oder APS+) aufgrund von objektiven, schwerwiegenden, tatsächlich überprüften Vorwürfen bzw aufgrund von Verletzungen entsprechend eingegangener Verpflichtungen im Rahmen des APS+ erfolgen und NICHT POLITISCH MOTIVIERT sind. Bei Nicht-Sanktion von Verstößen wie auch bei politischer Motivation von EU-Entscheidungen würde das APS an Glaubwürdigkeit und Effektivität verlieren.

a no profit organisation

Austria

trade policy

The temporary withdrawal provisions under Article 15 theoretically allow the GSP system to respond quickly to violations as they occur. This is particularly important where the reporting cycles of monitoring bodies are slow to pick up on serious abuses, or where Commission investigation processes may be slow in remedying them. However to the knowledge of trade unions this mechanisms has never been used in the case of labour standards. However the effectiveness of the Article could be improved through refining the language of Article 15(1)(a) - the first grounds for temporary withdrawal based on: "the serious and systematic violation of principles laid down in the conventions listed in Part A of Annex III, on the basis of the conclusions of the relevant monitoring bodies."

Firstly, the phrase "serious and systematic" should be replaced with the phrase "serious or systematic" to ensure that it capture violations that may be of an extremely serious nature e.g. a massacre, but not necessarily be systematic.

Secondly, temporary suspension should also be possible based on other sources of information, where monitoring bodies are unable to respond quickly. The phrase "or credible evidence" could be added to the end of the sentence, or "on the basis of the conclusions of the relevant monitoring bodies" could be deleted. An additional argument on this last point is that not all of the conventions have "relevant monitoring bodies", associated with them.

Trade unions believe that trade preferences should only be suspended as a measure of last resort, given the impact this action can have on the livelihoods of workers. Yet the threat of suspension must be credible for the scheme to be effective. An under-utilised way to walk this balance is for the Commission to consider using its power to investigation and suspend preferences on a sectoral or tariff line basis, as opposed to a national basis. This is could be particularly relevant for serious labour abuses that may be concentrated in a particular sector.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

IT MUST NOT BE THERE. WHEN LAWS ARE SIMPLE THE FRAUD DO NOT HAPPEN. IT IS ONLY COMPLEX RULES WHICH MAKE COUNTRIES AND BUSINESS HOUSES SEEK TO OTHER MEANS OF ACHIEVING DUTY FREE. MAKE IT SIMPLE AND REMOVE ANY HINDRANCE FROM IT.

a business association

BELGIUM

NITROGEN FERTILIZERS

Yes fraud and unfair trade should lead to withdrawal of GSP rights

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance
Indeed, the provision relating to "unfair" trading practices should be implemented in the way described above. It does not make sense to reduce a tariff preference on the one hand and on the other, to add a customs duty on the other, for the same product/origin. The need for a previous WTO determination does not make the system operational at all.

a business association

Belgium

Wood products

Fraude must be avoided and punished. This is against all trade principles and harms both trade from other countries and the industry image.

a business association

Belgium

Trade association: Man-made fibres

Any country where anti-dumping or countervailing duties are in place should be excluded

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

The operational character of the instruments should be reinforced in particular as regards unfair trading practices. The need for previous determination by the competent WTO body is currently making recourse to the instruments de facto impossible in case of unfair trading practices.

a business association

Belgium

Textiles & Clothing

The overall GSP system credibility and efficiency is based on the fulfilment by beneficiary countries of the conditions established by the EU. The disrespect or non-compliance with the GSP criteria must be detected and sanctioned in due time by withdrawing the preferences. Procedures should be made more swift and efficient. Fraud, transshipments and other illegal practices should be properly sanctioned and in case of recurrence the country should be definitively excluded from GSP benefits.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

By definition, any "temporary withdrawal instruments" weaken the stability of the GSP. Importers and retailers - the very target group supposed to be attracted by the GSP - need predictability and legal certainty. Preferences should only be withdrawn in a very limited number of exceptional cases and with sufficiently early notice. The withdrawal of Sri Lanka's GSP+ preferences was an example of good practice in this regard, given that the European Commission provided clarity to importers one year in advance. Economic operators could prepare and adjust in good time; major damages to importers were avoided.

a business association
Belgium
Representing the foreign trade interests of European retail trade
No

a citizen
Belgium
Finance
Yes

a company
Belgium
Import of food items
Abolish the GSP and make EU pay fair and honest for what we want to consume from them

a no profit organisation
Belgium
Agricultural and Agrifood Trade
No comment.

a no profit organisation
Belgium
trade union
The temporary withdrawal provisions under Article 15 theoretically allow the GSP system to respond quickly to violations as they occur. This is particularly important where the reporting cycles of monitoring bodies are slow to pick up on serious abuses, or where Commission investigation processes may be slow in remedying them. However to the knowledge of trade unions this mechanisms has never been used in the case of labour standards. However the effectiveness of the Article could be improved through refining the language of Article 15(1)(a) - the first grounds for temporary withdrawal based on: "the serious and systematic violation of principles laid down in the conventions listed in Part A of Annex III, on the basis of the conclusions of the relevant monitoring bodies."
Firstly, the phrase "serious and systematic" should be replaced with the phrase "serious or systematic" to ensure that it capture violations that may be of an extremely serious nature e.g. a massacre, but not necessarily be systematic.
Secondly, temporary suspension should also be possible based on other sources of information, where monitoring bodies are unable to respond quickly. The phrase "or credible evidence" could be added to the end of the sentence, or "on the basis of the conclusions of the relevant monitoring bodies" could be deleted. An additional argument on this last point is that not all of the conventions have "relevant monitoring bodies", associated with them.
Trade unions believe that trade preferences should only be suspended as a measure of last resort, given the impact this action can have on the livelihoods of workers. Yet the threat of suspension must be credible for the scheme to be effective. An under-utilised way to walk this balance is for the Commission to consider using its power to investigation and suspend preferences on a sectoral or tariff line basis, as opposed to a national basis. This is could be particularly relevant for serious labour abuses that may be concentrated in a particular sector.

a no profit organisation
Belgium
trade
Should remain as they are

other
Belgium
Representing working people in all sectors throughout Europe ---- European Trade Union Confederation
The temporary withdrawal provisions under Article 15 theoretically allow the GSP system to respond quickly to violations as they occur. This is particularly important where the reporting cycles of monitoring bodies are slow to pick up on serious abuses, or where Commission

investigation processes may be slow in remedying them. However to our knowledge this mechanisms has never been used in the case of labour standards. However the effectiveness of the Article could be improved through refining the language of Article 15(1)(a) - the first grounds for temporary withdrawal based on: "the serious and systematic violation of principles laid down in the conventions listed in Part A of Annex III, on the basis of the conclusions of the relevant monitoring bodies."

Firstly, the phrase "serious and systematic" should be replaced with the phrase "serious or systematic" to ensure that it capture violations that may be of an extremely serious nature e.g. a massacre, but not necessarily be systematic.

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We believe that trade preferences should only be suspended as a measure of last resort, given the impact this action can have on the livelihoods of workers. Yet the threat of suspension must be credible for the scheme to be effective. An under-utilised way to achieve this balance would be for the Commission to consider using its powers to investigate and suspend preferences on a sectoral or tariff line basis, as opposed to a national basis. This is could be particularly relevant for serious labour abuses that may be concentrated in a particular sector.

other

Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)

The temporary withdrawal provisions under Article 15 theoretically allow the GSP system to respond quickly to violations as they occur. This is particularly important where the reporting cycles of monitoring bodies are slow to pick up on serious abuses, or where Commission investigation processes may be slow in remedying them. However to our knowledge this mechanisms has never been used in the case of labour standards. However the effectiveness of the Article could be improved through refining the language of Article 15(1)(a) - the first grounds for temporary withdrawal based on: "the serious and systematic violation of principles laid down in the conventions listed in Part A of Annex III, on the basis of the conclusions of the relevant monitoring bodies"

Firstly, the phrase "serious and systematic" should be replaced with the phrase "serious or systematic" to ensure that it capture violations that may be of an extremely serious nature e.g. a massacre, but not necessarily be systematic.

Secondly, temporary suspension should also be possible based on other sources of information, where monitoring bodies are unable to respond quickly. The phrase "or credible evidence" could be added to the end of the sentence, or "on the basis of the conclusions of the relevant monitoring bodies" could be deleted. An additional argument on this last point is that not all the conventions have "relevant monitoring bodies" associated to them.

We believe that trade preferences should only be suspended as a measure of last resort, given the impact this action can have on the livelihoods of workers. Yet the threat of suspension must be credible for the scheme to be effective. An under-utilised way to achieve this balance would be for the Commission to consider using its powers to investigate and suspend preferences on a sectoral or tariff line basis, as opposed to a national basis. This is could be particularly relevant for serious labour abuses that may be concentrated in a particular sector.

other

Belgium

advising our members, interest representation ---- Cefic

Countries making use of unfair practices such as dual-pricing systems and export taxes should be removed from the GSP scheme. These unfair practices distort trade and investment flows and undermine the competitiveness of the European chemical industries. Dual-pricing and export taxes will most likely not be prohibited by the WTO in the near future. Yet, countries making use of these practices should not be 'rewarded' by preferential access to the European market.

a no profit organisation

Belgium, Brussels

leather sector. COTANCE represents interests of National Associations of Tanners and Dressers
Temporary withdrawal of preferences for product categories (all value added products made with that raw material) should apply swiftly and predictably in case of implementation by the beneficiary country (except LDCs) of export taxes or export restrictions on raw materials for that product.

a no profit organisation
Bolivia
Exportaciones
no

a no profit organisation
Bolivia
Representación de todos los Despachantes de Aduana de Bolivia.
Las medidas actuales deberían mantenerse como se encuentran actualmente y no incluir nuevas.

other
Bolivia
Entidad gremial del sector comercio, servicios y turismo ---- Cámara de Comercio
No

a business association
Brazil
industrial sector
"Temporary withdrawal instruments" should be maintained. The current instruments are sufficient to ensure that recipient countries do not use the GSP out of its purpose.

a company
Cambodia
Export
The EU should remain the current withdrawal mechanism.

a business association
Ecuador
Ecuadorian Exportes Federation
Los casos de fraude son de otra naturaleza a los de defensa comercial. Los primeros son instrumentos que deben ser reforzados mientras que los segundos preferiblemente deben ser excluidos de un esquema preferencial como el SGP+.

other
Ecuador
Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador
It is considered that this type of instruments must be reinforced, since the conditions triggering them not only harm the EU producers but also the exports of developing countries.

a business association
Finland
Pulp, paper, paperboard and wood products industries interest representation
The current "temporary withdrawal instruments" should be in place also in the new GSP.

a company
Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.
Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products
Should be reinforced. New instrument should be included: countries that take or keep unfair or strong trade measures to protect their specific industries should be removed from the scheme as regards the industries/products concerned.

a business association

France

Textile

This temporary withdrawal instruments should be reinforced in particular in case of unfair trading practices. It's important for the credibility of the system

a company

GERMANY

PHARMA/CHEMICALS

Countries making use of unfair practices such as dual-pricing systems and export taxes should be removed from the GSP scheme. These unfair practices distort trade and investment flows and undermine the competitiveness of the European industries. Dual-pricing and export taxes will most likely not be prohibited by the WTO in the near future. Yet, countries making use of these practices should not be 'rewarded' by preferential access to the European market.

a company

Germany

chemical sector

Countries which make use of unfair practices such as dual-pricing systems and export taxes should be removed from the GSP scheme. These unfair practices distort trade and investment flows and undermine the competitiveness of the European chemical industries. Dual-pricing and export taxes will most likely not be prohibited by the WTO in the near future. Yet, countries making use of these practices should not be 'rewarded' by preferential access to the European market.

a company

Germany

Think-tank for European and international economy and governance

see also Q 20 (with the proposal of European Parliament discussions in this case)

a company

Germany

production of fine chemicals on request - toll manufacturer for fine chemicals

when we manage to create a level playing field, the trade principles will be equal between all countries and therefore all countries will be treated for exports as they treat other in imports. When they support exports, it will create in import barrier in the ship to country. When they create import taxes, it will be added. When they violate production standards, it will create import taxes. This will bring the pressure on the countries to respect human rights and the environment.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

It would be useful to introduce in the successor scheme a temporary withdrawal provision, which would allow all GSP scheme beneficiaries to be temporary excluded from the scheme when violating provisions on human & labour rights, on sustainability and governance principles. Even when they do not comply with the provisions on food security.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

It would be useful to introduce in the successor scheme a temporary withdrawal provision, which would allow all GSP scheme beneficiaries to be temporary excluded from the scheme when violating provisions on human & labour rights, on sustainability and governance principles. Even when they do not comply with the provisions on food security.

a no profit organisation
India
Research in International Economic Relations
No comments.

other
Italy
SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner
I believe the actual instruments are effective enough. The problem is their implementation. This will become more complex if we increment the instruments

other
Lithuania
External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division
See answer to the Q20. Other instruments are fairly balanced.

a company
Malaysia
Textile
No

a company
Malaysia
Screw, Nut & Washer
No

a company
Malaysia
Manufacturing
should be reinforce

a company
Malaysia
Manufacturer
yes .reinforced

other
Malaysia
International trade and industry ---- Ministry of International Trade and Industry Malaysia
The current 'temporary withdrawal instruments' is sufficient and be maintained.

a business association
Myanmar
Association
The reinforcement or relaxation vof the "temporary withdrawal instruments" should be considered case by case, not collectively.

a company
Myanmar
Information Supply
Not sure

other
Panamá
Servicio ---- Ministerio de Comercio e Industria de Panamá
Los instrumentos de retirada temporal que se encuentran actualmente establecidos en el reglamento, son adecuados para evitar casos tales como: fraude, práctica comercial desleal, entre otros.

a business association

Portugal

Textile and Clothing Industry

The overall GSP system credibility and efficiency is based on the fulfilment by beneficiary countries of the conditions established by the EU. The disrespect or non-compliance with the GSP criteria must be detected and sanctioned in due time by withdrawing the preferences. Procedures should be made more swift and efficient. Fraud, transshipments and other illegal practices should be properly sanctioned and in case of recurrence the country should be definitively excluded from GSP benefits.

a company

Qatar

Liquified Natural Gas

No comment.

a business association

Spain

Fisheries

“Temporary withdrawal instruments” should be reinforced by increasing the number of on-the-spot controls.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 32. Goods made by prisoners should be OK for GSP treatment. Forced labour by prisoners might be another matter. But to judge from “One day in the life of Ivan Denisovich” by Alexander Solzhenitsyn it is hard to say that even forced labour is worse than no labour in a prison or a prison camp. If the exporter country behaves illegally it should be punished. But GSP should only be granted to countries that can fulfil the requirements, but on the other hand the requirements should be possible to fulfil easily even by administratively underdeveloped countries or corrupt countries. The Bangladesh scandals thru out the years illustrate this point in detail.

a no profit organisation

Sweden

RFSL, The Swdsh Federation for Lesbian, Gay, Bisexual and Transgender Rights, is the main LGBT-organisation i Sweden with 29 branches all over the country, working with LGBT rights, LGBT health, operating counselling services, arranging social and cultural activities, working with education, facilitating international projects in cooperation with other stakeholders etc. RFSL is a member of ILGA - International Lesbian, Gay, Bisexual and Transgender Association.

Human rights violations as a reason for temporary withdrawal should be reinforced.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

Thailand considers that the current temporary withdrawal instruments should not necessarily be relaxed but temporary withdrawal of preferences should be considered for individual cases rather than for the whole country. Thailand thus recommends that the EU continue to incorporate sufficient procedural guarantees in the system surrounding a temporary withdrawal. Also Thailand considers that there should be sufficient transitional arrangements provided for beneficiary countries in the case of temporary withdrawals in order to allow that country to adapt to the withdrawal of preferential arrangements. This is especially important for goods in transit or in warehouses before and/or during the temporary withdrawal process. Thus, Thailand recommends that the EU provide sufficiently early warning to the countries concerned before temporary withdrawal decisions enter into force.

a citizen

UK

Private

A report by influential think-tank the International Crisis Group (ICG) says (17 May 2010) that there should be an independent international inquiry into possible war crimes in Sri Lanka. The report also says eyewitness evidence suggests that at least 30,000 civilians were killed in the latter stages of the conflict, and countless others were either wounded or deprived of food and medicine.

a company

UK

Import and Distribution

re-inforced

other

UK

Multi sector trade union - public services, manufacturing and commercial services ---- trade union

The temporary withdrawal provisions under Article 15 theoretically allow the GSP system to respond quickly to violations as they occur. This is particularly important where the reporting cycles of monitoring bodies are slow to pick up on serious abuses, or where Commission investigation processes may be slow in remedying them. However, currently the system does not respond quickly enough, with the temporary withdrawal of GSP+ for Sri Lanka over shortcomings in human rights conventions taking 2 years, and temporary withdrawal of GSP privileges for Belarus for failure to comply with ILO conventions on freedom of association for workers taking 3 years. To the knowledge of trade unions this mechanism has never been used in the case of labour standards.

The effectiveness of the Article could be improved through amending Article 15(1)(a) - the first grounds for temporary withdrawal based on: "the serious and systematic violation of principles laid down in the conventions listed in Part A of Annex III, on the basis of the conclusions of the relevant monitoring bodies." to: "the serious violation of principles laid down in the conventions listed in Part A of Annex III, on the basis of the conclusions of the relevant monitoring bodies and/or other credible evidence." Violations of an extremely serious nature should not need to be serial or systematic to justify action.

Temporary suspension should also be possible based on other sources of credible information, particularly where monitoring bodies are unable to respond quickly, or there are no "relevant monitoring bodies" associated with the particular conventions.

Trade unions understand that the suspension of trade preferences can have a serious impact on the livelihoods of workers and should be a measure of last resort. However, the threat of suspension must be credible for the scheme to be effective.

The Commission should develop structures and practices to implement an impact assessment on labour and consult independent and democratic unions in the countries concerned as to how to implement sanctions whilst mitigating the negative impact on workers. This might involve the EU Commission considering suspension on a sector or tariff line basis, as opposed to a national basis. This is could be particularly relevant for serious labour abuses that may be concentrated in a particular sector.

a business association

United Kingdom

Seafood importation

Temporary withdrawal instruments introduce uncertainty in the GPS system and therefore should be used only in exceptional circumstances and announced a year in advance of implementation.

a no profit organisation

United Kingdom

Representing workers in all sectors in the UK

The temporary withdrawal provisions under Article 15 theoretically allow the GSP system to respond quickly to violations as they occur. This is particularly important where the reporting cycles of monitoring bodies are slow to pick up on serious abuses, or where Commission investigation processes may be slow in remedying them. However to our knowledge this mechanisms has never been used in the case of labour standards. However the effectiveness of the Article could be improved through refining the language of Article 15(1)(a) - the first

grounds for temporary withdrawal based on: “the serious and systematic violation of principles laid down in the conventions listed in Part A of Annex III, on the basis of the conclusions of the relevant monitoring bodies”.

Firstly, the phrase “serious and systematic” should be replaced with the word “serious” to ensure that it capture violations that may be of an extremely serious nature e.g. a massacre, but not necessarily be systematic.

Secondly, temporary suspension should also be possible based on other sources of information, where monitoring bodies are unable to respond quickly. The phrase “or credible evidence” could be added to the end of the sentence, or “on the basis of the conclusions of the relevant monitoring bodies” could be deleted. An additional reason supporting this last point is that not all the conventions have “relevant monitoring bodies”, associated with them.

We believe that trade preferences should only be suspended as a measure of last resort, given the impact this action can have on the livelihoods of workers. Yet the threat of suspension must be credible for the scheme to be effective. An under-utilised way to achieve this balance would be for the Commission to consider using its powers to investigate and suspend preferences on a sectoral or tariff line basis, as opposed to a national basis. This is could be particularly relevant for serious labour abuses that may be concentrated in a particular sector.

Q33: Should the criteria for opening an investigation under the Regulation be specified in more detail?

a business association

Argentina

Argentine Oil Industry Chamber

Yes, we encourage the EC to develop clear and transparent guidelines for the acceptance and opening of an investigation and the possibility to consult to the third country sector and government during the process. The new criteria will introduce a positive message to developing countries and reduce the potential threaten of protectionism lobbyist. Considering that the new GSP Regulation would have a longer period of validity it should make available a periodical review on affected countries. It also should be excluded the suspension mechanism set in art 16.3 of Regulation 732/2008.

a business association

Argentina

Argentine Biofuels Chamber

Yes, we encourage the EC to develop clear and transparent guidelines for the acceptance and opening of an investigation and the possibility to consult to the third country sector and government during the process. The new criteria will introduce a positive message to developing countries and reduce the potential threaten of protectionism lobbyist. Considering that the new GSP Regulation would have a longer period of validity it should make available a periodical review on affected countries. It also should be excluded the suspension mechanism set in art 16.3 of Regulation 732/2008.

a business association

Argentina

Rosario Board of Trade

Yes, we encourage the EC to develop clear and transparent guidelines for the acceptance and opening of an investigation and the possibility to consult to the third country sector and government during the process. The new criteria will introduce a positive message to developing countries and reduce the potential threaten of protectionism lobbyist. Considering that the new GSP Regulation would have a longer period of validity it should make available a periodical review on affected countries. It also should be excluded the suspension mechanism set in art 16.3 of Regulation 732/2008.

a business association

Argentina

Buenos Aires Grain Exchange

Yes, we encourage the EC to develop clear and transparent guidelines for the acceptance and opening of an investigation and the possibility to consult to the third country sector and government during the process. The new criteria will introduce a positive message to developing countries and reduce the potential threaten of protectionism lobbyist. Considering that the new GSP Regulation would have a longer period of validity it should make available a periodical review on affected countries. It also should be excluded the suspension mechanism set in art 16.3 of Regulation 732/2008.

a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

Yes, we encourage the EC to develop clear and transparent guidelines for the acceptance and opening of an investigation and the possibility to consult to the third country sector and government during the process. The new criteria will introduce a positive message to developing countries and reduce the potential threaten of protectionism lobbyist. Considering that the new GSP Regulation would have a longer period of validity it should make available a periodical review on affected countries. It also should be excluded the suspension mechanism set in art 16.3 of Regulation 732/2008.

a business association

Argentina

Bahia Blanca Grain Exchange

Yes, we encourage the EC to develop clear and transparent guidelines for the acceptance and opening of an investigation and the possibility to consult to the third country sector and government during the process. The new criteria will introduce a positive message to developing countries and reduce the potential threaten of protectionism lobbyist. Considering that the new GSP Regulation would have a longer period of validity it should make available a periodical review on affected countries. It also should be excluded the suspension mechanism set in art 16.3 of Regulation 732/2008.

a no profit organisation

Argentina

Export services

Yes, we encourage the EC to develop clear and transparent guidelines for the acceptance and opening of an investigation and the possibility to consult to the third country sector and government during the process. The new criteria will introduce a positive message to developing countries and reduce the potential threaten of protectionism lobbyist. Considering that the new GSP Regulation would have a longer period of validity it should make available a periodical review on affected countries. It also should be excluded the suspensión mechanism set in art 16.3 of Regulation 732/2008.

a no profit organisation

Argentina

Research on international Negotiations

Yes, we encourage the EC to develop clear and transparent guidelines for the acceptance and opening of an investigation and the possibility to consult to the third country sector and government during the process. The new criteria will introduce a positive message to developing countries and reduce the potential threaten of protectionism lobbyist. Considering that the new GSP Regulation would have a longer period of validity it should make available a periodical review on affected countries. It also should be excluded the suspension mechanism set in art 16.3 of Regulation 732/2008.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Sí, consideramos importante que el nuevo reglamento prevea lineamientos claros y transparentes para aceptar abrir una investigación y que se establezca un período de consultas

previo a la adopción de la medida tanto con el gobierno como con el sector afectado del país beneficiario en cuestión.

a business association

Argentina

Argentine Soybean Chain Association

Yes, we encourage the EC to develop clear and transparent guidelines for the acceptance and opening of an investigation and the possibility to consult to the third country sector and government during the process. The new criteria will introduce a positive message to developing countries and reduce the potential threaten of protectionism lobbyist. Considering that the new GSP Regulation would have a longer period of validity it should make available a periodical review on affected countries. It also should be excluded the suspension mechanism set in art 16.3 of Regulation 732/2008.

a no profit organisation

Austria

trade policy

Under Article 17 in the current regulations, only the Commission can initiate an investigation where it is satisfied that there are “sufficient grounds” for doing so. It can consult the GSP committee and member states in doing so. In practice, this has meant that on some occasions, when unions have requested the Commission to initiate investigations in the cases such as Colombia, nothing has happened. The same problem had been experienced a number of years earlier in the case of ETUC/ITUC submissions regarding forced labour in Pakistan. In short this process, while effective in some cases such as Belarus and Sri Lanka, lacks transparency and clarity. Having a clear procedure for filing and considering complaints and initiating investigations would aid the process.

In recognition of the enhanced role of the European Parliament on trade under the Lisbon Treaty, it should have the right, upon securing a simple majority, to commence an investigation. In the case of a violation of labour standards, an investigation should commence: upon application by one of the EU social partners recognised by the Commission; or where the ILO Conference Committee on the Application of Labour Standards has approved a “special paragraph” on labour practices - an unambiguous ILO conclusion that a serious violation has taken place - in a GSP beneficiary country. Under the US GSP system, third parties can submit petitions alleging violations of the eligibility criteria.

Finally, there should be a clearer process for re-admitting suspended countries onto the GSP+ scheme. Suspended countries should, naturally, have to comply fully with GSP conditions with regard to respect of core labour standards in order to be readmitted.

a business association

BELGIUM

NITROGEN FERTILIZERS

A simple price and volume questionnaire need to be made available it should in no way be based on the trade defence questionnaires

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

Yes, it would help industry to be able to exert its right of defence. It also ensures transparency and legal certainty.

a business association

Belgium

Trade association: Man-made fibres

Yes

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

Yes, in order to enable EU operators suffering injury as a result of the misuse of the GSP to exert their right of defence.

a business association

Belgium

Textiles & Clothing

Too much detail could preclude the possibility to open an investigation into situations that at first glance are dubious or not very clear.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

If this serves the purpose of legal certainty: yes, but not if such clarification would act as an invitation to request temporary withdrawal (e.g. for protectionist purposes).

a business association

Belgium

Representing the foreign trade interests of European retail trade

No

a citizen

Belgium

Finance

Yes

a company

Belgium

Import of food items

No idea

a no profit organisation

Belgium

Agricultural and Agrifood Trade

CELCAA calls for the introduction of a consultation with stakeholders before the opening of an investigation, in the view of a more transparent procedure. A clarification of the schedule of the different phases of the procedure is also required

a no profit organisation

Belgium

trade union

Under Article 17 in the current regulations, only the Commission can initiate an investigation where it is satisfied that there are "sufficient grounds" for doing so. It can consult the GSP committee and member states in doing so. In practice, this has meant that on some occasions, when unions have requested the Commission to initiate investigations in the cases such as Colombia, nothing has happened. The same problem had been experienced a number of years earlier in the case of ETUC/ITUC submissions regarding forced labour in Pakistan. In short this process, while effective in some cases such as Belarus and Sri Lanka, lacks transparency and clarity. Having a clear procedure for filing and considering complaints and initiating investigations would aid the process.

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Finally, there should be a clearer process for re-admitting suspended countries onto the GSP+ scheme. Suspended countries should, naturally, have to comply fully with GSP conditions with regard to respect of core labour standards in order to be readmitted.

a no profit organisation
Belgium
trade
Not necessary

a no profit organisation
Belgium
COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.
As the safeguard clause allows for a revision of the GSP scheme with regard to specific products or sectors, COCERAL asks for more transparency in the form of a consultation with stakeholders before the opening of the investigation. In addition, a more specific explanation regarding the timeline for all the steps of the procedure until its finalization is necessary.

other
Belgium
Representing working people in all sectors throughout Europe ---- European Trade Union Confederation
Under Article 17 in the current regulations, only the Commission can initiate an investigation where it is satisfied that there are "sufficient grounds" for doing so. It can consult the GSP committee and member states in doing so. In practice, this has meant that on some occasions, when unions have requested the Commission to initiate investigations in cases such as Colombia, no action has been taken. The same problem was experienced previously in the case of ETUC/ITUC submissions regarding forced labour in Pakistan.
In short this process, while effective in some cases such as Belarus and Sri Lanka, lacks transparency and clarity. Having a clear procedure for filing and considering complaints and initiating investigations would aid the process. We believe that the European Parliament should be extended the right to initiate an investigation, should a simple majority decide.
In the case of a violation of labour standards, an investigation should commence: upon application by one of the EU social partners recognised by the Commission; or where the ILO Conference Committee on the Application of Labour Standards has approved a "special paragraph" on labour practices - an unambiguous ILO conclusion that a serious violation has taken place - in a GSP beneficiary country. Under the US GSP system, third parties can submit petitions alleging violations of the eligibility criteria.
Finally, there should be a clearer process for re-admitting suspended countries onto the GSP+ scheme. Suspended countries should, naturally, have to comply fully with GSP conditions with regard to respect of core labour standards in order to be readmitted.

other
Belgium
Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)
The criteria for opening an investigation under the regulations should be clearly specified. The process should be transparent and all stakeholders should be contacted and consulted throughout any investigation.

other
Belgium
Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)
Under Article 17 in the current regulations, only the Commission can initiate an investigation where it is satisfied that there are "sufficient grounds" for doing so. It can consult the GSP committee and member states in doing so. In practice, this has meant that on some occasions, when unions have requested the Commission to initiate investigations in cases such as Colombia, no action has been taken. The same problem was experienced previously in the case of ETUC/ITUC submissions regarding forced labour in Pakistan.
In short this process, while effective in some cases such as Belarus and Sri Lanka, lacks transparency and clarity. Having a clear procedure for filing and considering complaints and initiating investigations would aid the process. We believe that the European Parliament should be extended the right to initiate an investigation, should a simple majority decide. In the case

of a violation of labour standards, an investigation should commence: upon application by one of the EU social partners recognised by the Commission; or where the ILO Conference Committee on the Application of Labour Standards has approved a "special paragraph" on labour practices - an unambiguous ILO conclusion that a serious violation has taken place - in a GSP beneficiary country. Under the US GSP system, third parties can submit petitions alleging violations of the eligibility criteria.

Finally, there should be a clearer process for re-admitting suspended countries onto the GSP+ scheme. Suspended countries should, naturally, have to comply fully with GSP conditions with regard to respect of core labour standards in order to be readmitted.

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

Si deberían ser detallados con mayor detalle en el Reglamento.

a no profit organisation

Bolivia

industry

Yes, it should be absolutely transparent.

a company

Cambodia

Export

No it should not.

a business association

Ecuador

Ecuadorian Exportes Federation

Los criterios para abrir una investigación están expresados con claridad en el Reglamento 732/2008 y en la Decisión 1999/468/CE.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

Criteria to initiate an investigation are clearly explained in Regulation 732/2008 and in the Decision 1999/468/CE, therefore any additional specification is not necessary.

a business association

Finland

Pulp, paper, paperboard and wood products industries interest representation

Yes, if it's only possible.

a business association

France

Textile

It could help for investigations.

a company

Germany

Think-tank for European and international economy and governance

should be specified in rule of law way and in details (dont know now by heart if they are already specified)

a company

germany

chemical production

yes this would be very helpful

a company

Germany
production of fine chemicals on request - toll manufacturer for fine chemicals
yes

a no profit organisation
Germany
trade union
Yes, the EC should not decide on its own, if an investigation can be opened or not.

a business association
In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...
Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).
Yes, in order to ensure the transparency of the GSP Scheme.

a business association
In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...
Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).
Yes, in order to ensure the transparency of the GSP Scheme.

a no profit organisation
India
Research in International Economic Relations
No comments.

other
Italy
SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner
Yes. For transparency.

other
Lithuania
External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division
The current regulation does not provide for criteria for the opening an investigation in respect of the beneficiary countries, which did not ratify conventions listed in the Part A of the Annex III, but allegedly systematically violate their principles.

a company
Malaysia
Textile
Yes

a company
Malaysia
Screw, Nut & Washer
No

a company
Malaysia
Manufacturing
yes

a company
Malaysia
Manufacturer
yes

other

Malaysia

International trade and industry ---- Ministry of International Trade and Industry Malaysia

The criteria for opening an investigation under the Regulation would be maintained and viewed as sufficient.

other

Mauritius

International Trade ---- Government official

yes

a business association

Myanmar

Garment and Apparel Manufacturing

While pursuing objectives by granting GSP or punishing for violation by removing GSP, an investigation is necessary before putting into application. It is also necessary to have re-instatement mechanism like graduation mechanism so that the punished country can get another chance for development.

a company

Myanmar

Information Supply

No too difficult to implement.

a company

Qatar

Liquified Natural Gas

The current criteria for opening an investigation seem reasonable.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

Thailand suggests that the EU provide a clear definition of the following concepts incorporated in Article 15(1) of the 2008 GSP Regulation: (a) 'Serious and systematic violation'; (c) 'Serious shortcomings in customs control'; and (d) 'unfair trade practices'. Such definitions would enhance legal certainty and a common understanding of possible violations of the criteria listed in Article 15(1).

a citizen

UK

Private

Japan Times writes "Not content with increasing the military's size five-fold since the late 1980s to more than 200,000 troops today, Colombo is raising the strength further to 300,000, in the name of "eternal vigilance." Soon after the May victory, the government, for example, announced a drive to recruit 50,000 new troops to help manage the northern areas captured from the rebels." Link to Japan Times: <http://search.japantimes.co.jp/cgi-bin/eo20090919bc.html> We agree with Japan Times. Sri Lanka already has a far larger army than any country its size requires. The extra soldiers are apparently required because the Colombo government expects to reignite a rebellion among the Tamil population, a rebellion it is right to expect because it is doing everything in its power to cause the rebellion.

Why would a government try to start up another civil war within its boundaries? We think that Colombo's goal is to drive the Tamils out of Sri Lanka as fast as they can, and the best way to do this is to re-start the civil war and kill as many Tamils as they can with aerial attacks, shelling, cluster bombing, and so forth. That is, kill and scare as many away as possible, as fast as possible.

The European Union, by giving Sri Lanka with through the GSP Plus program, is helping Sri Lanka to enlarge and strengthen its armed forces and is subsidizing the numerous atrocities and abuses by which Colombo is provoking the expected uprising among the Tamils.

a company
UK
Import and Distribution
yes

other
UK

Multi sector trade union - public services, manufacturing and commercial services ---- trade union
GMB believes the criteria for opening investigations should be widened to allow third parties (to include trade unions) to submit petitions alleging violations of the eligibility criteria, as is the case under the US GSP system. Under the current regulations only the Commission can initiate an investigation where it is satisfied that there are "sufficient grounds" for doing so. In practice, the Commission has shown reluctance to initiate investigations in cases such as Colombia and Costa Rica, despite well documented complaints being presented by trade unions and NGO's. The current system lacks transparency and clarity. Having a more open and clear procedure for filing and considering complaints and initiating investigations is vital to the credibility of the system.

In the case of a violation of labour standards, and particularly trade union rights and freedoms, in a GSP beneficiary country, an investigation should be triggered upon application by one of the EU social partners recognised by the Commission; or where the ILO conference Committee on the Application of Labour Standards has approved a "special paragraph" on labour practices - an unambiguous ILO conclusion that a serious violation has taken place.

The enhanced role of the European Parliament on trade under the Lisbon Treaty, should allow it the right, upon securing a simple majority, to insist on an investigation. The process for re-admitting suspended countries onto the GSP+ scheme should be clearer and more transparent, ensuring countries comply fully with GSP conditions with regard to respect of core labour standards before being readmitted.

a business association
United Kingdom
Seafood importation
No comment

a no profit organisation
United Kingdom
Representing workers in all sectors in the UK

Under Article 17 in the current regulations, only the Commission can initiate an investigation where it is satisfied that there are "sufficient grounds" for doing so. It can consult the GSP committee and member states in doing so. In practice, this has meant that on some occasions, when unions have requested the Commission to initiate investigations in cases such as Colombia, no action has been taken. The same problem was experienced previously in the case of ETUC/ITUC submissions regarding forced labour in Pakistan.

In short this process, while effective in some cases such as Belarus and Sri Lanka, lacks transparency and clarity. Having a clear procedure for filing and considering complaints and initiating investigations would aid the process.

We believe that the European Parliament should be extended the right to initiate an investigation, should a simple majority decide. In the case of a violation of labour standards, an investigation should commence: upon application by one of the EU social partners recognised by the Commission; or where the ILO Conference Committee on the Application of Labour Standards has approved a "special paragraph" on labour practices - an unambiguous ILO conclusion that a serious violation has taken place - in a GSP beneficiary country.

Under the US GSP system, third parties can submit petitions alleging violations of the eligibility criteria. Finally, there should be a clearer process for re-admitting suspended countries onto the GSP+ scheme. Suspended countries should, naturally, have to comply fully with GSP conditions with regard to respect of core labour standards in order to be readmitted.

Q34: The European Commission during its administrative procedures observes general principles of EU law including the rights of defence. The rights of defence include the right to be heard, the right of access to the file and the principle of sound administration. Should there be any specific rules, including in the GSP Regulation, that would allow the country being subject of proceeding for the temporary withdrawal to better exercise its rights of defense?

a business association

Argentina

Argentine Oil Industry Chamber

Yes, appropriate technical assistance should be granted to assure effective rights of defense. Rights to defense should mean suitable time for responses and a clear and transparent methodology about the information to be provided by the affected country. The assessment and subsequently decision of UE authorities should be sounded legal motivated on objective and public well-known basis.

a business association

Argentina

Argentine Biofuels Chamber

Yes, appropriate technical assistance should be granted to assure effective rights of defense. Rights to defense should mean suitable time for responses and a clear and transparent methodology about the information to be provided by the affected country. The assessment and subsequently decision of UE authorities should be sounded legal motivated on objective and public well-known basis.

a business association

Argentina

Rosario Board of Trade

Yes, appropriate technical assistance should be granted to assure effective rights of defense. Rights to defense should mean suitable time for responses and a clear and transparent methodology about the information to be provided by the affected country. The assessment and subsequently decision of UE authorities should be sounded legal motivated on objective and public well-known basis.

a business association

Argentina

Buenos Aires Grain Exchange

Yes, appropriate technical assistance should be granted to assure effective rights of defense. Rights to defense should mean suitable time for responses and a clear and transparent methodology about the information to be provided by the affected country. The assessment and subsequently decision of UE authorities should be sounded legal motivated on objective and public well-known basis.

a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

Yes, appropriate technical assistance should be granted to assure effective rights of defense. Rights to defense should mean suitable time for responses and a clear and transparent methodology about the information to be provided by the affected country. The assessment and subsequently decision of UE authorities should be sounded legal motivated on objective and public well-known basis.

a business association

Argentina

Bahia Blanca Grain Exchange

Yes, appropriate technical assistance should be granted to assure effective rights of defense. Rights to defense should mean suitable time for responses and a clear and transparent methodology about the information to be provided by the affected country. The assessment and

subsequently decision of UE authorities should be sounded legal motivated on objective and public well-known basis.

a no profit organisation

Argentina

Export services

Yes, appropriate technical assistance should be granted to assure effective rights of defense, in the frame o an objective and public well-known basis. Rights to defense should mean suitable time for responses and a clear and transparent methodology about the information to be provided by the affected country.

a no profit organisation

Argentina

Research on international Negotiations

Yes, appropriate technical assistance should be granted to assure effective rights of defense. Rights to defense should mean suitable time for responses and a clear and transparent methodology about the information to be provided by the affected country. The assessment and subsequently decision of UE authorities should be sounded legal motivated on objective and public well-known basis.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Debería considerarse la posibilidad de otorgar asistencia técnica al país beneficiario objeto de investigación para garantizar que su gobierno pueda ejercer efectivamente su derecho a defensa.

a business association

Argentine

Argentine Soybean Chain Association

Yes, appropriate technical assistance should be granted to assure effective rights of defense. Rights to defense should mean suitable time for responses and a clear and transparent methodology about the information to be provided by the affected country. The assessment and subsequently decision of UE authorities should be sounded legal motivated on objective and public well-known basis.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Die betroffenen Lieferländer sollten selbstverständlich Verteidigungsrechte haben, wie dies die Vorgaben von Rechtsstaatlichkeit einfordern.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

THESE ARE ALL RESULTS OF TOO MANY LAWS. ONCE IT IS MADE SIMLER, EVERYONE WILL SAVE TIME AND MONEY AND THE GSP WILL WORK MUCH BETTER. TODAY IS A TOOL FOR MAKING A LIVING FOR ORGANISATIONS WHICH SUPPOSEDLY HELP GOVERNEMENTS CONTINUE GSP FACILITY, OR MISUSE IT.

a business association

BELGIUM

NITROGEN FERTILIZERS

All rights and obligations should be maintained for all parties thus there is confidence that the administration and politics involved are handled in a correct and balanced way

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance
No specific comments.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

The Notice and Decisions in administrative proceedings are published in the Official Journal and include the reasons for opening and the alleged infringements. But, there is little further information on the progress of the investigation. Although “rights of the defence” are referred to above in the text of the question, neither the Regulation nor the relevant notices/decisions make any mention of such rights. Provisions should be included on the legal status of economic operators as interested parties and their rights to be heard, to access the file, etc.

a business association

Belgium

Trade association: Man-made fibres

No

a business association

Belgium

Textiles & Clothing

The current regime safeguards already beneficiary countries rights of defense.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

The right of defence should be a matter of course, to the extent it contributes to legal certainty.

a business association

Belgium

Representing the foreign trade interests of European retail trade

This is not necessary.

a citizen

Belgium

Finance

Yes

a company

Belgium

Import of food items

Is this " right of defense " not a kind of a hoax ?

a no profit organisation

Belgium

Agricultural and Agrifood Trade

The right of defence should be equally ensured to any States, EU Member State or third country.

a no profit organisation

Belgium

trade

The countries should have the opportunity to present it defense.

a no profit organisation

Belgium

COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

Third countries should benefit from the same rights of defence as any EU state, while the procedure should bear clear timing rules.

other

Belgium

Representing working people in all sectors throughout Europe ---- European Trade Union Confederation

The right of defense should be accompanied by openness and transparency to enable other stakeholders, including trade unions, to rebut untrue and misleading statements.

other

Belgium

Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)

In the case of administrative proceedings, Notice and Decisions are published in the Official Journal and details of the reasons for opening the investigation and the alleged infringements are given. But there is little further information on the progress of the investigation. Although “rights of the defence” are referred to above in the text of the question, neither the Regulation nor the relevant Notices/Decisions make any mention of such rights. Provisions should be included on the legal status of economic operators as interested parties and their rights to be heard, to access the file and to exercise all other rights of defence normally allowed in proceedings of this kind.

other

Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)

The right of defense should be accompanied by openness and transparency to enable other stakeholders, including trade unions, to rebut untrue and misleading statements.

other

Belgium

advising our members, interest representation ---- Cefic

Horizontal aspects Duration of the Regulation

a no profit organisation

Bolivia

Representación de todos los Despachantes de Aduana de Bolivia.

Si debería existir una normativa específica.

a business association

Brazil

industrial sector

The rights of defense are guaranteed in the GSP Regulation when it is established that the beneficiary country is notified of the opening of an investigation, the notification should provide a summary of relevant information, and interested parties are allowed to submit their comments in writing and so giving an opportunity to cooperate in the investigation.

a company

Cambodia

Export

No there should not be.

other

Colombia

Tourism and Trade (Import-Export) ---- Government of Colombia

Colombia considers it important for the right to defense to be always present. Furthermore, there should be some continuity in the application of preferences during any process, if not the right to defense is reduced by punishing before proving the guilt.

a business association

Ecuador

Ecuadorian Exportes Federation

Se recomienda establecer las siguientes condiciones en el desarrollo de los procedimientos administrativos: - Acceso con total transparencia a la información que lleva a la Comisión a iniciar una investigación - Recibir con suficiente anticipación la notificación de la investigación - Permitir acceso al país y a los agentes comerciales a los procedimientos de investigación y tomar en cuenta los comentarios que se hagan al respecto - No aplicar medidas provisionales o anticipadas - En el caso de que se apliquen medidas hacerlo solamente por el período que sea estrictamente necesario y de manera proporcional a la infracción cometida.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

It is recommended to establish the following conditions for the development of the administrative procedures: - To provide the necessary time and tools for the preparation of the defense; - To be listened at the right moment and under equality of conditions. - To apply proportionality between the infringement and the sanction, in order to apply the minimum necessary sanctions. - To reduce the duration of the procedure to a minimum.

a company

GERMANY

PHARMA/CHEMICALS

In order to ensure predictability and stability it could be taken into account to keep in force the next GSP regulation for a longer period of time (e.g. 5-10 years). However, during the entire period of the Regulation graduation should be at any time possible and continually adapted in justified cases.

a company

Germany

Think-tank for European and international economy and governance

The EU rule of law rules incl. the et audiatur et altera pars rule should be taken in account adequately; in case of need the regulation should be adapted

a company

Germany

production of fine chemicals on request - toll manufacturer for fine chemicals

when we manage to create a level playing field, the trade principles will be equal between all countries and therefore all countries will be treated for exports as they treat other in imports. When they support exports, it will create in import barrier in the ship to country. When they create import taxes, it will be added. When they violate production standards, it will create import taxes. This will bring the pressure on the countries to respect human rights and the environment.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

Please, please see question Q33.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

Please, please see question Q33.

a no profit organisation

India

Research in International Economic Relations
No suggestions.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

No

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

No, the right of defence is already sufficiently ensured.

a company

Malaysia

Textile

Yes

a company

Malaysia

Screw, Nut & Washer

Yes

a company

Malaysia

Manufacturer

yes

other

Malaysia

International trade and industry ---- Ministry of International Trade and Industry Malaysia

The beneficiary countries would be given a platform and opportunities to defend / provide their views in any allegation made against them.

a business association

Myanmar

Garment and Apparel Manufacturing

The country which is being subject of proceeding for the temporary withdrawal should be allowed to exercise its rights of defense. Economic and GSP sanctions were imposed on Myanmar since 1997, fourteen years already, unilaterally, where the measure hits the wrong people, poor people who lose their jobs, while those responsible for forced labor(the issue that led to imposing of sanctions) remain unscathed. Plenty of witness can confirm this statistics. This is clearly notable with regard to industries such as garment and fisheries, most of which were closed down and the workers were jobless and misplaced.This could not have been the intention of EU. For the people of Myanmar, this counter-productive sanction should be reviewed as a right.

a business association

Myanmar

Association

The country being subject of proceeding for the temporary withdrawal should be allowed to exercise its rights of defense. As the European Union is conducting a global review of GSP, I would like to ask EU that Myanmar, which has been under GSP sanction since 1997, should be given a chance to be reviewed this counterproductive sanction.

a company

Myanmar

Information Supply

Yes i.e. Myanmar Garments sector in which the principle of GSP is not being adhered to.

a company

Qatar

Liquified Natural Gas

Rights of defence, consistent with Commission principles, should be incorporated into the regulations.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 34. Yes.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

Under the 2008 GSP Regulation, the Commission is obliged to notify the country concerned of its intention to initiate an investigation to temporarily withdrawal trade preferences. Subsequently, the Commission has to give the country concerned the opportunity to cooperate in this investigation. Furthermore, the Commission may verify the information received from organizations such as the UN and the ILO with economic operators and the beneficiary country concerned. Thailand suggests that: (i) the EU amend this provision in order to oblige the Commission to verify the information it received with the cooperating beneficiary country so as to guarantee that country that the rights of defense have been complied with and (ii) the EU explicitly incorporate a provision in the new GSP Regulation which will oblige the EU institutions to give the beneficiary country the opportunity to comment on the Commission's preliminary and final proposal to introduce a temporary withdrawal of the preferences for the country concerned. The opportunity to provide comments to the Commission's proposal should be followed by an obligation for the EU's institutions to give an adequate and satisfactory reply to those comments.

a citizen

UK

Private

There should be an independent international inquiry into possible war crimes in Sri Lanka. Otherwise permanently withdrew the GSP+ for Sri Lanka.

a business association

United Kingdom

Seafood importation

No comment

a no profit organisation

United Kingdom

Representing workers in all sectors in the UK

The right of defense should be accompanied by principles of openness and transparency to allow complainants or alleged victims of violations - often trade unions and the workers they represent - to understand the defense being put, and allow them a right of reply to rebut untrue and misleading statements.

Q35: Following the entry into force of the Lisbon Treaty, the legislative procedure for the GSP Regulation has changed and will inevitably be more drawn-out than was the case previously. As a result, the current approach based on relatively short-duration (3-year) Regulations within a broad framework lasting 10 years is no longer sustainable. What would be the appropriate duration for the next GSP Regulation?

a business association

Argentina

Argentine Oil Industry Chamber

It would be a positive sign to concede longer period preferences to beneficiaries countries. However, it necessary requires providing periodical review mechanisms to de-graduate excluded products or re-evaluate the qualification of included products as sensitive.

a business association

Argentina

Argentine Biofuels Chamber

It would be a positive sign to concede longer period preferences to beneficiaries countries. However, it necessary requires providing periodical review mechanisms to de-graduate excluded products or re-evaluate the qualification of included products as sensitive.

a business association

Argentina

Rosario Board of Trade

It would be a positive sign to concede longer period preferences to beneficiaries countries. However, it necessary requires providing periodical review mechanisms to de-graduate excluded products or re-evaluate the qualification of included products as sensitive.

a business association

Argentina

Buenos Aires Grain Exchange

It would be a positive sign to concede longer period preferences to beneficiaries countries. However, it necessary requires providing periodical review mechanisms to de-graduate excluded products or re-evaluate the qualification of included products as sensitive.

a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

It would be a positive sign to concede longer period preferences to beneficiaries countries. However, it necessary requires providing periodical review mechanisms to de-graduate excluded products or re-evaluate the qualification of included products as sensitive.

a business association

Argentina

Bahia Blanca Grain Exchange

It would be a positive sign to concede longer period preferences to beneficiaries countries. However, it necessary requires providing periodical review mechanisms to de-graduate excluded products or re-evaluate the qualification of included products as sensitive.

a no profit organisation

Argentina

Export services

It would be a positive sign to concede longer period preferences to beneficiaries countries. In that way, a reminder of answer question 19 is emphasized.

a no profit organisation

Argentina

Research on international Negotiations

It would be a positive sign to concede longer period preferences to beneficiaries countries. However, it necessary requires providing periodical review mechanisms to de-graduate excluded products or re-evaluate the qualification of included products as sensitive.

other

ARGENTINA

PRODUCTOS AGRICOLAS ---- MINISTERIO DE AGRICULTURA, GANADERIA Y PESCA - ARGENTINA

Atento a que (tal lo señalado en la respuesta 8) las preferencias por sí solas no alcanzan para asegurar que una exportación sea materializada y que se deben adoptar medidas de diversa naturaleza tanto desde el ámbito público como privado para poder vender efectivamente el producto, consideramos positivo que se prevean períodos más largos de aplicación de las

preferencias otorgadas bajo SGP. No obstante ello, sería necesario prever mecanismos periódicos de revisión que posibiliten des-graduar productos retirados o recalificar productos incluidos como sensibles.

a business association

Argentina

Argentine Soybean Chain Association

It would be a positive sign to concede longer period preferences to beneficiaries countries. However, it necessary requires providing periodical review mechanisms to de-graduate excluded products or re-evaluate the qualification of included products as sensitive.

a business association

Austria

representation of the interests of all Austrian companies (mandatory membership); statutory representation of all economic interests; participation in the law making process; provides services for members

Unter der Prämisse der Forderungen nach Stabilität, Vorhersehbarkeit und Rechtssicherheit könnten wir uns eine Geltungsperiode von 5 Jahren vorstellen, innerhalb der die Parameter unverändert bleiben (Einstufung der Waren, Graduierung, Degraduierung, Schwellen, Rahmenbedingungen); Änderungen innerhalb der 5-Jahresperiode könnten bzw müssten zugelassen werden im Zusammenhang mit dem Entzug von Präferenzen sowie der Antragstellung und Gewährung von APS+.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

FIVE YEARS IS IDEAL INCLUDING ONE YEAR NOTICE FOR ANY CHANGE.

a business association

Belgium

International trade in flowers

The current approach based on 3-year duration has demonstrated to be insufficient for the economic operators to adapt to the changes of the scheme. For this reason Union Fleurs highly welcomes the European Commission proposal on the 2-year extension of the current GSP scheme (until the end of 2013) since it will enable importers and exporting countries to better prepare for the new rules in good time. We believe that the next GSP regulation should last 5 years; this duration would also turn to be more compatible with the broader GSP framework lasting 10 years. The GSP must be must be simple, easy to apply, and more predictable in order to give traders the appropriate legal certainty necessary to operate.

a business association

BELGIUM

NITROGEN FERTILIZERS

5 years is preferable to 3 years.

a business association

Belgium

representing interests of companies of all sizes and sectors of activity in Europe

The broad framework could be made valid for 15 years and the adjustments/review mechanisms should be operated every 5 years. The latter should be considered as implementing mechanisms and should therefore be operated under comitology procedure.

a business association

Belgium

representation of interests of the EU food and drink industry

Importing companies would welcome longer validity of the GSP scheme and more predictability regarding the envisaged suspensions (e.g. an early warning system). This would also create additional incentives for investment in developing countries.

a business association

Belgium

International trade

The current approach based on 3-year duration has demonstrated to be insufficient for the economic operators to adapt to the changes of the scheme. For this reason FRUCOM highly welcomes the European Commission proposal on the 2-year extension of the current GSP scheme (until the end of 2013) since it will enable importers to better prepare for the new rules in good time. We believe that the next GSP regulation should last 5 years; this duration would also turn to be more compatible with the broader GSP framework lasting 10 years. The GSP must be simple, easy to apply, and more predictable in order to give traders the appropriate legal certainty necessary to operate.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance
A 10 year for the overall framework seems reasonable. Changes/revisions appear quite workable provided that enough notice is given. The issue is more linked to the notice given than to the frequency of the change.

a business association

Belgium

FESI is the EU public affairs trade association representing the sporting goods industry.

The intervals for the review of the GSP Regulation within a 10-year framework regulation should not be longer than 5 years but providing for an earlier review may be necessary based on economic developments.

a business association

Belgium

Trade association: Man-made fibres

Five years

a business association

Belgium

to assert and defend the interests of the EU non-ferrous metals industry in all domains of EU policy of relevance to the industry

The broad framework could be made valid for 15 years and the adjustments/review mechanisms should be operated every 5 years. The latter should be considered as implementing mechanisms and should therefore be operated under Comitology procedure

a business association

Belgium

Textiles & Clothing

Probably a 5 year regulation with the possibility of updating some of its conditions.

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

The next GSP Regulation should provide for maximal stability and predictability. EuroCommerce does not recommend a specific duration, but would advise that the duration could be significantly extended.

a business association

Belgium

Representing the foreign trade interests of European retail trade

Inappropriate duration for the next GSP regulation will be five years.

a no profit organisation

Belgium

Agricultural and Agrifood Trade

We believe that the current three-year duration approach is insufficient for economic operators to adapt for the changes. In order to favour investments in agricultural production in developing

countries, the future GSP regulation should be applicable for a period of 5 years, since this duration will enable importers to better adapt to the future GSP scheme, while at the same time being more compatible with the broader GSP framework lasting 10 years. Any changes in the current regulation should be made public at least with a minimum of one year but preferably two years in advance. The GSP must be more predictable, but also simple and easy to apply in order to give traders the appropriate legal certainty necessary to operate.

a no profit organisation

Belgium

trade

15 years with 5 years revision

a no profit organisation

Belgium

COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

COCERAL believes that, in order to favour investments in agricultural production in developing countries, the future GSP Regulation should be applicable for a period of five years. Any changes in the current Regulation should be made public two years before their entry into force.

other

Belgium

Representing working people in all sectors throughout Europe ---- European Trade Union Confederation

The new procedures need not to be more drawn-out under the Lisbon Treaty if the institutions co-operate effectively, and if the Commission improves its own systems of monitoring and investigation as mentioned in this response. The central focus of any review of the system is how to guarantee its integrity of the system, and ensure that status is granted or withdrawn in a more open and transparent way, taking into account the valuable input from third parties. If the duration of the regulations is extended beyond the current 3 years, which we are not convinced is necessary, then monitoring and investigations of complaints, and procedures for withdrawal where necessary, will need to be rapid and effective.

other

Belgium

Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)

The intervals for the review of the GSP Regulation within a 10-year framework regulation should not be longer than 5 years but providing for an earlier review if such is necessary based on economic developments. If the GSP status is removed and/or suspended for one country, then a warning a minimum of eighteen to twenty-four months advance is necessary for business to adapt to the new environment.

other

Belgium

Trade Union ---- CSC - Confédération des Syndicats Chrétiens (largest Belgian Trade Union)

The new procedures need not to be more drawn-out under the Lisbon Treaty if the institutions co-operate effectively, and if the Commission improves its own systems of monitoring and investigation as mentioned in this response. The central focus of any review of the system is how to guarantee its integrity of the system, and ensure that status is granted or withdrawn in a more open and transparent way, taking into account the valuable input from third parties. If the duration of the regulations is extended beyond the current 3 years, which we are not convinced is necessary, then monitoring and investigations of complaints, and procedures for withdrawal where necessary, will need to be rapid and effective.

other

Belgium

advising our members, interest representation ---- Cefic

The next GSP Regulation should remain in force for 5 to 10 years, in order to avoid that the Commission needs to start preparations for a new proposal only shortly after the Regulation's entry into force - because the legislative procedure takes a considerable period of time. However, during the duration of the Regulation, graduation should be continually adapted in justified cases.

a no profit organisation
Bolivia
Trade and export promotion, export companies advice
Five years or more

a no profit organisation
Bolivia
International Trade Promotion and Technical Assistance
At least five years

a no profit organisation
Bolivia
industry
5 years

other
Bolivia
Government ---- Government Official
Due consideration must be given to all circumstances in order to ensure that the new Regulation is not detrimental for any of the beneficiaries, current and potential.

a business association
Brazil
industrial sector
Considering the complexity of the legislative process and the objective of the GSP program to promote a global and stable preferential scheme, the time duration of the GSP Regulation should be five years. A broad framework should last 15 years, maintaining the former proportion.

other
Brazil
Government ---- Ministry of External Relations - Federative Republic of Brazil
The next GSP regulation should have a long duration, enough to provide both predictability and stability for exporters from developing countries, which need these elements to develop their businesses links with the EU.

a company
Cambodia
Export
The consecutive year should be extended to five years.

other
Colombia
Tourism and Trade (Import-Export) ---- Government of Colombia
Colombia believes that the framework should last 15 or 20 years and the implementing regulations should be adjusted every 5 years.

a business association
Ecuador
Ecuadorian Exportes Federation
Sería recomendable que el tiempo de vigencia de cada Reglamento sea de por lo menos 5 años.

other
Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

It is advisable to extend the duration for each Regulation to 5 years.

a business association

Finland

Pulp, paper, paperboard and wood products industries interest representation

3-4 years.

a company

Finland (HQ), Austria, Estonia, France, Germany, Poland, Slovakia, Sweden, UK; production in all these countries. In addition sales companies in many other countries.

Forest-based industries: wood products, pulp, paper, board, tissue, wood procurement, trading of wood products

3 years is OK.

a business association

France

MEDEF, the French Business Confederation, is the voice of the French Industry, Services and Trade. It represents about 700.000 small, medium and multinationales companies

The next GSP regulation should remain in force from 5 to 10 years. During this period, graduation should be continually adapted in justified cases.

a business association

France

Textile

5 years would be an appropriate duration for the next GSP regulation

a company

Germany

chemical sector

The next GSP Regulation should remain in force for a longer time (e.g. 5 to 10 years), in order to ensure predictability and stability. However, during the duration of the Regulation, graduation should be continually adapted in justified cases.

a company

Germany

Think-tank for European and international economy and governance

> 4 ys, depending of the present duration of the Lisboa procedure (which I cannot yet estimate)

a company

Germany

We consider a duration of 5 years as appropriate with a review of graduation after 2,5 years.

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

The next GSP Regulation should remain in force for 5 to 10 years, in order to avoid that the Commission needs to start preparations for a new proposal only a short while after the Regulation's entry into force - because the legislative procedure takes a considerable period of time. However, during the duration of the Regulation, graduation should be continually adapted in justified cases.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

For the stability of the GSP scheme, it could be established regulations for 5 - 7 years.

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products. (ANFACO - CECOPESCA - National Association of Canned fish and seafood manufacturers).

For the stability of the GSP scheme, it could be established regulations for 5 - 7 years.

a no profit organisation

India

Research in International Economic Relations

At a minimum the duration of the Regulation should be increased to 5 years. Better still the Regulation should be valid for ten years but with a provision for midterm review.

other

Italy

SME Support - Enterprise Europe Network Partner ---- Special Agency of the Chamber of Commerce of Naples - Enterprise Europe Network Partner

I believe, between 5 and 7 years. (shorter periods will impact on the business cycle)

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

We believe that duration of the next GSP regulation could be longer - for example 6 years.

a company

Malaysia

Textile

2 years

a company

Malaysia

Screw, Nut & Washer

7years will be more appropriate

a company

Malaysia

Manufacturing

20 years

a company

Malaysia

Manufacturer

at least 15 yrs

other

Malaysia

International trade and industry ---- Ministry of International Trade and Industry Malaysia

5 years.

a company

Myanmar

Information Supply

4 years

other

Panamá

Servicio ---- Ministerio de Comercio e Industria de Panamá

El periodo de tiempo apropiado para la siguiente regulación del SGP debe ser de 5 años, manteniéndose la vigencia del programa en una duración de 10 años.

a company

Qatar

Liquified Natural Gas

An increase in the application of the GSP Regulation to say, 5 years duration, would seem to provide a better fit with the new legislative process.

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 35. 5 year periods seem suitable. We hope that GSP is unnecessary within 10 years. In ten years we should have free import of everything into EU. The concept of duties is out of date. The revenue is not even covering the cost of the custom organisations and the bureaucracy on EU and national levels.

other

Switzerland

Policy research and negotiation assistance ---- International organization

At least 5 years

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

Thailand considers that the longer period of the next GSP is necessary to ensure stability and predictability of the scheme. Thus Thailand suggests that the broad framework regulation should be extended to 15 years whilst the short-duration regulations should be adopted in five-year intervals.

a citizen

UK

Economic research

10 years, with the possibility of ad hoc modifications if there are major changes (FTAs, a Doha settlement)

a company

UK

Import and Distribution

5 years

other

UK

Multi sector trade union - public services, manufacturing and commercial services ---- trade union

GMB does not believe that the new procedures need to be more drawn-out under the Lisbon Treaty if the institutions co-operate effectively, and if the EU Commission looks to improving its own systems of monitoring and investigation as mentioned in this response. What has to be the central focus of any review of the system is how to guarantee the integrity of the system, and ensure that status is granted or withdrawn in a more open and transparent way, taking into account the valuable input from third parties. If the duration of the regulations is extended beyond the current 3 years, which we are not convinced is necessary, then monitoring and investigations of complaints, and procedures for withdrawal where necessary, will need to be rapid and effective.

a business association

United Kingdom

Seafood importation

No comment

a no profit organisation

United Kingdom

Representing workers in all sectors in the UK

The new procedures need not to be more drawn-out under the Lisbon Treaty if the institutions co-operate effectively, and if the Commission improves its own systems of monitoring and investigation as mentioned in this response. The central focus of any review of the system should be on how to guarantee the integrity of the system, by ensuring that status is granted or withdrawn in a more open and transparent way, taking into account the valuable input from third parties. If the duration of the regulations is extended beyond the current 3 years, which we are not convinced is necessary, then monitoring and investigations of complaints, and procedures for withdrawal where necessary, will need to be rapid, credible and effective.

Q36: Are there any other aspects of the current GSP regulation 732/2008 that should be reviewed or changed? If yes, which and in what way?

a business association

Argentina

Argentine Oil Industry Chamber

GSP (Art. 4 y Annex II) should include the whole tariff lines (or most of them), so as to consider GSP as useful instrument of the EU to succeed in supporting developing and less developed countries.

a business association

Argentina

Argentine Biofuels Chamber

GSP (Art. 4 y Annex II) should include the whole tariff lines (or most of them), so as to consider GSP as useful instrument of the EU to succeed in supporting developing and less developed countries.

a business association

Argentina

Rosario Board of Trade

GSP (Art. 4 y Annex II) should include the whole tariff lines (or most of them), so as to consider GSP as useful instrument of the EU to succeed in supporting developing and less developed countries.

a business association

Argentina

Buenos Aires Grain Exchange

GSP (Art. 4 y Annex II) should include the whole tariff lines (or most of them), so as to consider GSP as useful instrument of the EU to succeed in supporting developing and less developed countries.

a business association

Argentina

Cordoba Grain Exchange and Arbitration Chamber

GSP (Art. 4 y Annex II) should include the whole tariff lines (or most of them), so as to consider GSP as useful instrument of the EU to succeed in supporting developing and less developed countries.

a business association

Argentina

Bahia Blanca Grain Exchange

GSP (Art. 4 y Annex II) should include the whole tariff lines (or most of them), so as to consider GSP as useful instrument of the EU to succeed in supporting developing and less developed countries.

a no profit organisation

Argentina

Export services

As relates to the universe of the products involved under GSP of UE (Art. 4 and Annex II), all products (tariff lines) should be included or at least most of them. On this way, GSP will be a more advantage instrument in supporting all level of developing countries.

a no profit organisation

Argentina

Research on international Negotiations

GSP (Art. 4 y Annex II) should include the whole tariff lines (or most of them), so as to consider GSP as useful instrument of the EU to succeed in supporting developing and less developed countries.

a business association

Argentine

Argentine Soybean Chain Association

GSP (Art. 4 y Annex II) should include the whole tariff lines (or most of them), so as to consider GSP as useful instrument of the EU to succeed in supporting developing and less developed countries.

a business association

BANGLADESH

INDUSTRY AND BUSINESS CHAMBER ACTIVITIES

GSP IS HELPING NATIONS BUT IT COULD DO MUCH MORE IF IT IS MADE SIMPLE, EASY TO USE AND LOCAL CONTENT PROBLEM IS TAKEN OUT. REVIEW IS A MUST - REVIEW IT FROM THE POSITION OF A POOR NATION AND NOT FROM THE POSITION OF AN EU COUNTRY

a business association

Belgium

International trade in flowers

We are aware that GSP rules of origin are not direct subject of this consultation but we would like to reiterate their crucial importance for the effective functioning of the GSP and to secure the use of GSP preferences by operators. In particular, we wish to express the need to maintain the certificate of origin A and to ensure an effective protection of importers' good faith through a fair allocation of risk and responsibilities.

The proposed shift in the certification of GSP origin from the public authorities in the origin countries to accredited exporters, under discussion since 2005, would result in an unjustified and inadequate burden on European importers and leave them without any legal security in their international transactions, for which they remain fully liable for as long as 3 years after importation into the EU.

The resulting unmanageable commercial risks will definitely turn European importers away from using preferential schemes to import from developing countries, seriously undermining, as a result, both the integration of these countries in the world economy and the EU competitiveness.

Union Fleurs therefore strongly insists that any review of the GSP scheme must absolutely take this aspect into consideration if the general objective is indeed to increase the use and effectiveness of the preferences granted to developing countries.

a business association

Belgium

Renewable energies

It should be possible to "graduate" individual CN Codes when developing countries have reached the same level of development as developed countries, which can be assessed according to prices and import volumes.

a business association

BELGIUM

NITROGEN FERTILIZERS

Every effort should be made to simplify the regime to the benefit of the poorest economies. Criteria and a safeguard mechanism should be made workable to exclude GSP beneficiaries conducting unfair, fraudulent or environmentally unacceptable practices.

a business association

Belgium

International trade

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The resulting unmanageable commercial risks will definitely turn European importers away from using preferential schemes to import from developing countries, seriously undermining, as a result, both the integration of these countries in the world economy and the EU competitiveness.

FRUCOM therefore strongly insists, as called for on numerous occasions since 2005, that any review of the GSP scheme must absolutely take this aspect into consideration if the general objective is indeed to increase the use and effectiveness of the preferences granted to developing countries.

a business association

Belgium

To represent and defend the interests of the EEA producers of Ferro-Alloys in all areas of relevance

The main issues of concern are: - a proper and consistent definition of the product scope - removal of those countries/products which are subject to trade defence measures for the duration of these measures - exclusion of economies in transition and emerging economies to maximise the benefit for LDC's

a business association

Belgium

Wood products

It should not be possible to grant preferential treatment to countries that take unfair measures to protect their own production (e.g. high import tariffs for products originating in EU, even in absence of own production or when one cannot speak about sensitivity). There is a risk that countries adjacent to a country benefiting from GSP status may delocate their production to that country in order to have an easier access to the EU markets. This should be avoided.

a business association

Belgium

Trade association: Man-made fibres

No

a business association

Belgium

Umbrella lobby of European commerce (retail, wholesale, international trade)

Although not directly subject to this consultation, the GSP rules of origin are an indispensable criterion for the usefulness of the scheme. EuroCommerce wishes to re-iterate its views expressed at various occasions on the need to maintain the certificate of origin Form A for those importers requesting it, the need for effective protection of importers' good faith (as partly established in the old article 220 II b Customs Code) and the need for a fair allocation of risks and responsibilities between trade and customs.

a business association

Belgium

Representing the foreign trade interests of European retail trade
No further amendments necessary.

a no profit organisation

Belgium

Agricultural and Agrifood Trade

We are aware that GSP rules of origin are not direct subject of this consultation but we would like to reiterate their crucial importance for the effective functioning of the GSP and to secure the use of GSP preferences by operators. In particular, we wish to express the need to maintain the certificate of origin A and to ensure an effective protection of importers' good faith through a fair allocation of risk and responsibilities.

a no profit organisation

Belgium

trade

NO

a no profit organisation

Belgium

COCERAL, the voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agrosupply trade.

The main provisions of the current GSP Regulation should be preserved, but more clarification should be given on the rules concerning graduation and the safeguard clause. In order ensure more predictability for operators, extended timelines for communication on eventual changes as well as an extended validity period for the entire system should be foreseen.

other

Belgium

Representation of the interests of branded clothing retailers ---- European Branded Clothing Alliance (Trade Association)

The system would be greatly improved if the new GSP Regulation allowed interregional cumulation for the textile sector among all countries benefiting from the GSP system.

other

Belgium

advising our members, interest representation ---- Cefic

Graduation of beneficiary countries and products should be made in comitology (Article 291 of the Treaty on the Functioning of the European Union/TFEU).

a no profit organisation

Bolivia

Trade and export promotion, export companies advice

No

a no profit organisation

Bolivia

International Trade Promotion and Technical Assistance

No

a business association

Brazil

industrial sector

The current regulation does not provide the criteria for de-graduation. A clear mechanism, through which the interested country can request de-graduation on the basis of the most recent data, should be supplied.

a company

Cambodia

Export

No comment.

a business association

Ecuador

Ecuadorian Exporters Federation

Se podría incluir la oportunidad de tratar conjuntamente temas relativos a la cooperación, el desarrollo de programas y proyectos que promuevan la inversión, así como dar un tratamiento preferencial al tema de las medidas o barreras para-arancelarias.

other

Ecuador

Foreign Affairs, Trade and Integration ---- Ministry of Foreign Affairs, Trade and Integration of Ecuador

The treatment of non-tariff barriers and non reimbursable economic and technical co-operation should be included.

a business association

Finland

Trade Policy

Simplicity of rules of origin

a business association

Finland

Pulp, paper, paperboard and wood products industries interest representation

Preferential treatment cannot be given to countries that take unfair measures to protect their own production.

a business association

Germany

Biofuels

Berlin, 31 May 2010 VDB comment on the DG TRADE consultation: Revision of the Generalised System of Preferences (also sent via E-Mail) The Association of the German Biofuel Industry (VDB) wants to take the opportunity to comment on the public consultation on the revision of the Generalised System of Preferences (GSP). In general, VDB strongly supports the comment of the European Biodiesel Board (EBB) and wants to emphasize the given statement from the point of view of the German biodiesel industry. As we see a strong increase of biodiesel imports into the EU and Germany from countries like Argentina, Malaysia or Indonesia the German biodiesel industry sees the biodiesel production in these countries as highly competitive and built especially for exporting to the EU and US.

Furthermore certain advantages, especially due to differential export taxes in Argentina, favour the export of biodiesel. Under these circumstances it seems questionable if these countries should still benefit from tariff preferences for biodiesel under the GSP. Looking at the utilisation of the German biodiesel capacities during the last years it becomes clear that there was a sharp decline in biodiesel production. In addition to changes in the political framework, growing imports from abroad started to threaten the German biodiesel industry by causing the demand for biofuels in Germany to drop. In 2007 and 2008 especially biodiesel originating from the United States of America (the so called B99) flooded the German market at a dumping price. With the implementation of countervailing duties against B99 the EU stopped most of the imports from the U.S, despite current and increasing circumvention attempts.

However, European biodiesel producers have had to compete with a mature biodiesel industry from other countries, whose competitive advantages are further increased by policy support measures. In 2009 imports from other countries than the US increased dramatically. According to Eurostat, the open German market allowed for imports amounting to 0.77 million tons from EU Member States and only 3,754 tons from outside the EU.

However, nearly all imports to Germany transit via the Netherlands and most of the 600,000 tons imported from the Netherlands to Germany are in reality imports from outside the EU transiting via the Dutch territory. In 2009, the Netherlands have produced approximately 300,000 tons according to provisional EBB Statistics, while domestic consumption is estimated around the same quantity (450,000 tons for Benelux according to USDA GAIN Report EU27 Biofuels Annual 2009).

In this context, it is fair to assume that imports to Germany from non-EU countries amount to at least 500,000 tons. In comparison, Germany produced 2.5 million tons in 2009, running at only 50% of installed capacities. The duty-free access to the European markets has been benefiting Argentina, Indonesia and Malaysia, three countries notably opposed to a global level-playing field in biodiesel trade, maintaining high tariffs on European biodiesel and specific trade-distortive measures intended to promote biodiesel exports.

Therefore the Association of the German Biofuel Industry supports the recommendation of the European Biodiesel Board to reintroduce the MFN tariff for bio-diesel (tariff code 3824.90.91) for beneficiaries of the GSP general scheme, by modifying Annex II of the forthcoming new GSP Regulation as shown in the EBB statement. Association of the German Biofuel Industry Verband der Deutschen Biokraftstoffindustrie e. V. Elmar Baumann Managing Director

a company

Germany

Think-tank for European and international economy and governance

don't think so

a company

Germany

production of fine chemicals on request - toll manufacturer for fine chemicals

make sure that all aspects are covered: Unfair trade should not be honored. Child work, work by prisoners should not be honored, violation of environmental standards should not be honored, enforcement of standards should be implemented, all countries should be treated the same, barriers or subventions in one country should be mirrored by all other countries of the world, to create a level playing field. To make it a level playing field we will also have to reconsider the question how to fight dumping. In case of specialties with a small market, the anti dumping rules are far too sophisticated and not manageable for SMEs.

other

Germany

advising our members, representation of the economic interests ---- VCI - Verband der Chemischen Industrie, German Association of the Chemical Manufacturers

Graduation of beneficiary countries and products should be made in comitology (Article 291 of the Treaty on the Functioning of the European Union/TFEU).

a business association

In Spain. Some of our members have investments in some GSP+ beneficiary countries, such as Guatemala, Equator, El Salvador, Peru, Honduras, Nicaragua, ...

Processing and trading industry of fishery and aquaculture products (FEICOPESCA: Spanish Federation of Associations of processing and trading industry of fishery and aquaculture products).

Although this questionnaire is not for the RULES OF ORIGIN, we would like to recall our positing regarding the GSP rules of origin:

- We would like to stress the importance of maintaining the current preferential rules of origin for the GSP scheme. As modifications to facilitate the use of the GSP by their users, the processing and trading sector of fisheries and aquaculture products considers positive the removal of the requirement of the crew nationality and the increase to 15% of the GSP tolerance rule in order to harmonize it with the tolerance rule under the EPAs.

- we would like to stress that the change proposed by the current reform of GSP rules of origin regarding the proof of origin will have a negative impact on the EU industry. Under the GSP proposal of reform, the statement on origins shall be made out by the registered exporters. Therefore, the responsibility for the certification of the originating status of products would move from the authorities of beneficiary countries, which would be free from their essential and basic responsibility, which is to provide with a reliable guarantee in the certification of origin, to the private operators, so there would be an increase of the legal risk and lack of juridical safety for the importer.

- As we have previously mentioned, with the intended modification the legal uncertainty of the importer would increase since he would approve the statement made out by the exporter even though it was wrong based on information only known by himself. Therefore, such modification should be accompanied by a reinforcement of the good faith of the importer, because the importer should rely on the declaration issued by a third one and not by a public authority, as it

currently happens. In any case, the current system, even when it protects the good faith of the importer it is done in a biased way, because if the cause of error is the information provided by the exporter, the importer should assume the responsibility. In spite of this, it is necessary to give continuity to the current system instead of giving a bigger legal uncertainty to the importer if the intended statement of origin was approved.

In this way, The responsibility for the certification of the originating status of products must be kept by the authorities of beneficiary countries that ensure independence and impartiality.

a business association

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Although this questionnaire is not for the RULES OF ORIGIN, we would like to recall our positing regarding the GSP rules of origin:

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a no profit organisation

India

Research in International Economic Relations

No suggestions.

other

Lithuania

External trade policy issues ---- Ministry of Foreign Affairs, Foreign Trade Policy Division

No.

a company

Malaysia

Screw, Nut & Washer

No

a company

Malaysia

Manufacturing

Not sure

other

Malaysia

International trade and industry ---- Ministry of International Trade and Industry Malaysia

Chapter III of the Regulation is viewed as obstacles to penetrate EU market access due to Temporary Withdrawal and Safeguard Provisions which may not in line with the GSP objectives.

a company

Myanmar

Information Supply

Yes, allow Myanmar to have GSP.

a company

Qatar

Liquefied Natural Gas

No comment.

a business association

Spain

Representing the interests of the Spanish biofuels industry

1. Executive summary

APPA Biofuels, the Spanish Biofuels Association, welcomes the opportunity to contribute to the comprehensive revision of the Generalized System of Preferences (GSP), recently launched by the European Commission (EC). APPA Biofuels, which gathers the bulk of the biofuels production in the country, believes that the Commission's decision to substantially revise this salient trade instrument is most timely, given the important trade challenges confronting Spanish and EU biodiesel producers today.

The successor GSP Regulation for 2012-2015 needs to be refined and fine-tuned in order to take account of evolutions in trade flows and adapt to them accordingly.

Most importantly, the future GSP scheme should continue to ensure the EU's active support to sustainable development and poverty reduction in developing countries, without jeopardizing the development and competitiveness of the respective EU industry.

The Spanish biodiesel sector has been severely affected by the imports of subsidized and dumped biodiesel from the United States (B99). In 2008, more than 77% of the biodiesel consumed in Spain was B99. While in March 2009 the Commission imposed adequate anti-subsidy and countervailing duties on B99 imports, these have now shifted to exporting developing countries. These countries benefit from the duty free access to the EU market, granted under the current GSP scheme, despite having a mature and fast-growing biodiesel industry.

As biodiesel imports from these developing countries (in particular Argentina, Indonesia and Malaysia) negatively affect both the Spanish and the EU biodiesel sector, APPA Biofuels recommends the reintroduction of the MFN (Most-Favoured-Nation) tariff for biodiesel (6,5% ad valorem) for the countries benefiting from the GSP general scheme.

2. Biodiesel:

EU Tariff classification and preferential GSP treatment According to Commission Regulation 948/2009, biodiesel ("Fatty acid mono-alkyl esters, containing by volume 96, 5% or more of esters") is classified under customs code 38249091, which belongs to Chapter 38 for "Miscellaneous Chemical products" and to Section VI "Products of the chemical and allied industry". Given that Chapter 38 "Miscellaneous chemicals" is part of the products covered by the GSP, a preferential tariff was automatically applied to biodiesel imports as well, without taking into account the specific characteristics of this sector.

In Annex 2 of the GSP Regulation currently in force, the customs code for biodiesel falls under the category "ex Chapter 38", in which all products are considered as "non-sensitive". As a "non-sensitive" product, biodiesel has its tariff fully removed, as opposed to "sensitive" products which only benefit from a three percentage points cut. Consequently, all developing countries under the GSP scheme can export biodiesel with a 0% tariff to the EU.

3. The 0% tariff for biodiesel puts at risk the Spanish industry

This preferential trade treatment for biodiesel has benefited enormously three developing countries covered by the GSP scheme - Argentina, Indonesia and Malaysia- to the detriment of the Spanish biodiesel industry. Severely affected by the B99 imports from the US in 2008, Spanish producers did not have the chance to recover in 2009, given that B99 imports were basically replaced by imports of soybean methyl ester (SME) from Argentina and palm-oil methyl ester (PME) from Indonesia and Malaysia.

These imports have been favoured by the 0% tariff for biodiesel from these countries, which puts the Spanish producers in a situation of competitive disadvantage. According to Spanish Customs data (May 2010), these three developing countries account for more than 44% of all biodiesel imports to Spain in 2009, compared to only 21% in 2008.

Moreover, the data for the first quarter of 2010 show that 75% of biodiesel imports to Spain come from Argentina, Malaysia and Indonesia. (see Table 1 below) In the first four months of 2010, Argentine biodiesel exports are estimated to have hit a new record with heavy sales to Europe in general, and to Spain, in particular. Cumulative exports to the EU in January and February 2010 reached 255,012 tonnes compared with 74,590 in the same period in 2009 .

Almost half of these exports were destined to the Spanish market (101,437 tonnes) (F.O. Lichts, 28 May 2010). This represents a spectacular increase in imports of SME from Argentina in comparison to the same period last year, when only 6,000 tonnes were imported in the Spanish market. Imports of palm-oil biodiesel from Indonesia have also doubled in the first quarter of 2010, in comparison to the same period last year, reaching 22, 036 tonnes (11, 820 tonnes in 2009) (Spanish customs data, May 2010). (see Table 1 below)

As a consequence, in 2009 imports maintained a high level of 56% of all biodiesel consumed in Spain, compared to 74% in 2008 (due to B99 imports from the US) and 51% in 2007 (CORES, 2010; APPA Biofuels statistics, 2010). Therefore, a mere 21% of the installed production capacity for biodiesel in Spain was used in 2009. This implies that 79% of Spanish biodiesel capacity was lying idle in 2009, a trend that is likely to continue in 2010 as well, given the record biodiesel imports in the first quarter of this year. (CORES, 2010; APPA Biofuels statistics, 2010).(see Table 2 below)

Therefore, Spanish companies are weakened against the low cost biodiesel imports from the countries which have 0% tariff under the Generalised System of Preferences.

4.The 0% duty on biodiesel maintains a situation of tariff injustice

Due to the decision in 2009 of the EU Customs Code Committee to cancel the specific tariff suspension for palm oil to be processed into biodiesel (Council Regulation 564/2009, of 25 June 2009), the normally applicable non-preferential import duty for refined palm oil (5, 1% ad valorem) was reintroduced from 1 July 2009. This customs duty differential has been giving an important incentive to both Indonesia and Malaysia to produce biodiesel locally and export it to Europe, given that they benefit from a 0% tariff.

This incentive is even greater in the case of Indonesia, who levies an export tax on crude palm oil of 4, 5% (in April 2010) in order to ensure the supply of its domestic market (including the biofuels sector) and stabilize prices. The price difference caused by the imposition of a tariff on refined palm oil but not on palm-oil-based biodiesel is expected to lead to an increase of biodiesel imports to the detriment of the Spanish industry. This problem is augmented during the summer period as the CFPP (Cold Filter Plugging Point) limit is increased from -10 °C to 0 °C. Palm oil - based biodiesel currently has a high CFPP value and without the aid of additives it would never comply with the winter limit. However, during summer period it is easier to reach the limit. This is only for blends higher than 5% biodiesel as for lower percentages biodiesel does not need to comply with the CFPP limit.

As far as the raw materials from Argentina are concerned, export taxes on soybean oil make it 32% cheaper on the domestic market than on the export market, creating a very strong incentive to process soybean oil into biodiesel in Argentina, rather than in the EU (which is the main destination for the Argentine soy methyl ester) .

The Argentinean government introduced this advantageous export taxation of this key commodity as an incentive for oil millers and commodity majors to invest in biodiesel in Argentina. (Ron Steenblich, "Subsidies: the distorted economics of biofuels", 2007)

These Differential Export Taxes on soybean oil and on soybean biodiesel have lead to the creation of a strong and fast-growing Argentine biodiesel industry with a manufacturing capacity of 2, 7 million tonnes, with which the Spanish biofuels producers cannot compete.

5. Conclusions and recommendations

Taking into account this unjust tariff situation, a compensatory tariff should be fixed for biodiesel in order to have a level playing field between the Spanish and EU producers and the mature and well-developed biofuel producers from Argentina, Malaysia and Indonesia. Therefore, APPA Biofuels believes that the MFN tariff for biodiesel should be reintroduced for beneficiaries of the GSP general scheme (thus including Argentina, Malaysia and Indonesia).

This can be easily achieved by amending the Annex 2 of the current GSP Regulation, by explicitly mentioning that the arrangement referred to in Section 1 of Chapter II of the Regulation does not apply to the product “Fatty-acid mono-alkyl esters” (tariff code 3824.90.91).

This measure would significantly contribute to reducing imports to sensitive markets like the Spanish one, where more than 71% of the installed capacity in Spain is lying idle, mainly due to the large share of imports in the national biodiesel consumption. It will also enable Spanish and European producers to better compete with the mature biodiesel industry from these third countries which do not only benefit from a significant price advantage, but are also artificially and unnecessarily supported by the EU preferential tariff policy.

At the same time, the reintroduction of the MFN will not affect other emerging biodiesel exporting countries, mainly located in Central America and West Africa. As they are beneficiaries of the GSP+ and Everything But Arms schemes, these countries will continue to benefit from duty-free access to the EU market if the 0% tariff for biodiesel were to be removed from the general GSP agreement.

The reintroduction of the MFN tariff for biodiesel would also be in line with the principles included in the Commission Communication 461/2004 on the Generalized System of Preferences, which clearly states that “tariff preferences should be targeted on countries that most need it”. In the case of the biodiesel industry in Argentina, Malaysia and Indonesia, the EU’s GSP policy has achieved its goal: these countries’ export capacity and performance are competitive, sustainable and diversified.

The biodiesel sectors of these developing countries have been successfully integrated into the global economy. Hence there is no need anymore to maintain preferential tariffs for biodiesel under the GSP scheme. Any prolongation of this tariff would stimulate an artificial development of the biodiesel industry of the three aforementioned developing countries, while at the same time deeply affecting the development and competitiveness of the Spanish and European biodiesel producers.

The current revision of the GSP scheme gives the chance to the Commission and the other European institutions to correct this tariff injustice.

Table 1 BIODIESEL IMPORTS TO SPAIN (tonnes) Argentina Indonesia Malaysia % of imports to Spain Jan-Dec 2008 84,58 72,832 5,755.76 21% Jan-Dec 2009 197,368.41 36,008.55 20,083.20 44% Jan-Mar 2010 101,437 22,036 2,029 75% Source: Spanish customs data, 2010

Table 2 EVOLUTION OF BIODIESEL PRODUCTION IN RELATION TO INSTALLED CAPACITY IN SPAIN Year 2007 2008 2009 Production (t) 148.777 191.621 851.658 Capacity (t/a) 815.190 2.070.020 4.110.400 Source: APPA Biofuels Statistics

For more details on the data provided above, please consult the position paper that we sent to the responsible unit in DG Trade on 31 May, at 14.00. APPA Biofuels

a business association
Spain

Representing the interests of the Spanish biofuels industry

APPA Biofuels, the Spanish Biofuels Association, welcomes the opportunity to contribute to the comprehensive revision of the Generalized System of Preferences (GSP), recently launched by the European Commission (EC).

APPA Biofuels, which gathers the bulk of the biofuels production in the country, believes that the Commission’s decision to substantially revise this salient trade instrument is most timely, given the important trade challenges confronting Spanish and EU biodiesel producers today.

The successor GSP Regulation for 2012-2015 needs to be refined and fine-tuned in order to take account of evolutions in trade flows and adapt to them accordingly. Most importantly, the future GSP scheme should continue to ensure the EU’s active support to sustainable development and poverty reduction in developing countries, without jeopardizing the development and competitiveness of the respective EU industry.

The Spanish biodiesel sector has been severely affected by the imports of subsidized and dumped biodiesel from the United States (B99). In 2008, more than 77% of the biodiesel consumed in Spain was B99. While in March 2009 the Commission imposed adequate anti-subsidy and countervailing duties on B99 imports, these have now shifted to exporting developing countries. These countries benefit from the duty free access to the EU market, granted under the current GSP scheme, despite having a mature and fast-growing biodiesel industry.

As biodiesel imports from these developing countries (in particular Argentina, Indonesia and Malaysia) negatively affect both the Spanish and the EU biodiesel sector, APPA Biofuels recommends the reintroduction of the MFN (Most-Favoured-Nation) tariff for biodiesel for the countries benefiting from the GSP general scheme.

We have sent a complete position paper by email to TRADE GSP Consultation@ec.europa.eu, today, 31 May 2010, at 14.00, given that the online questionnaire does not allow for the inclusion of charts and footnotes.

We thank you in advance for considering our position.

APPA Biofuels (APPA Biocarburantes)

a business association

Sweden

Representing the Swedish textile-, garment-, and shoe import trade

Q 36. Please change the origin rules as we have suggested. Without that change GSP will soon be out of date. Remember that China beats the GSP every day.

other

Thailand

Competent Issuing Authority of Form A ---- Government-Department of Foreign Trade, Ministry of Commerce

To improve the current scheme and to optimize utilization of the next scheme, Thailand suggests the following:

(1) Simple rules: simple structures and application for importers and beneficiary countries particularly if the GSP is designed to be used by the SMEs.

(2) Predictability & legal certainty: all elements of the new GSP and any changes must be published and notified well in advance (at least one year) to the GSP users (e.g. through DG Trade website).

(3) Coverage: to enhance the attractiveness of the scheme, the objectives under the new GSP should include a more progressive trade liberalisation. There should be no sectoral or product-specific exclusions and the list of tariff lines permitted duty-free access should be expanded. More "sensitive" products should be allowed to receive preferential access. A lower than 3.5 per cent (e.g. 3%) point margin should be introduced under the new scheme.

(4) Preferential rules of origin: less complexity and more transparency in application of the rules. Availability of mechanism to facilitate the governmental agencies of those beneficiary countries to increase the awareness and knowledge of the rules of origin under the GSP scheme.

a business association

United Kingdom

Seafood importation

Although not the subject of this consultation, the GSP system is dependent on the issuing and authorisation of certificates of origin. We feel very strongly that the importer acting in 'good faith' in relation to this certification needs to be legally protected.

other

Vietnam

government official ---- government official

Considering the role of each sector to the economy of developing countries and the corresponding sectors in European Union, Vietnam has honor to request the European

Commission to change the products of tropical and sub-tropical aquatic products, textile and garment, coffee, wooden products, handicraft and bicycle from the sensitive lists to non-sensitive list.