



UNITED STATES COUNCIL FOR INTERNATIONAL BUSINESS

Ambassador Katherine Tai
United States Trade Representative
The Winder Building
600 17th Street, NW
Washington, DC 20508

Dear Ambassador Tai:

Your comments at the Center for American Progress *Greening U.S. Trade Policy* program on April 15, were both motivating and thought-provoking. You outlined the Administration's vision to green both U.S. and multilateral trade policy as an urgent priority. As a multisectoral business group representing leading U.S. companies in international markets and multilateral forums, the United States Council for International Business (USCIB) welcomes your invitation to engage and share the American business community's experience and ideas in this effort.

USCIB welcomes the opportunity to respond and open a dialogue to identify solutions that will mobilize trade for positive environmental impact and enhance market access for U.S. innovation and exports of sustainable technologies and materials. We are keen to support a trade agenda that reinvigorates negotiations on environmental goods and services, addresses fossil fuel and fisheries subsidies, ensures compatibility between environmental and trade rules, and considers the circular economy holistically.

In that regard, USCIB and its members understand that resource conservation is a critical environmental consideration and that resilient supply chains must recognize and account for the finite supply of planetary resources. In the race to the top which you encouraged, the U.S. private sector knows that there are effective and responsible options available to recycle, recover, refurbish, remanufacture, and repurpose end-of-life goods so that they return to the stream of commerce and provide continual value to society.

Circular economy business models should reduce the extraction and consumption of natural resources and the generation of industrial and consumer wastes. The OECD *Business Models for the Circular Economy Policy Highlights (2018)* clearly articulates five circular business models that represent fundamentally different ways to produce and consume goods and services and drive the transition towards a more resource efficient economy.

One of these models focuses on resource recovery – the recycling of end-of-life goods into secondary raw materials, diverting them from final disposal and displacing the extraction, processing, and depletion of virgin natural resources. Unfortunately, outdated trade policies and international rules that restrict cross border flows of used products and secondary material feedstock continue to be obstacles to effective and efficient resource recovery. The reduction of such barriers alongside the encouragement and implementation of environmentally sound options to recycle and recover waste will help enable creative solutions that work in synergy with trade,

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Business and Industry Advisory Committee (BIAC) to the OECD
ATA Carnet System

rather than imposing counter-productive barriers. There are numerous examples that can be shared to further elaborate how support for resource recovery can advance the overall objectives of the greening of U.S. trade policy.

Since 1945, USCIB has been the voice of U.S. business in the United Nations system and in other multilateral institutions, including the WTO. Our membership encompasses over 300 global corporations, professional firms and industry associations, providing business input for USCIB to convey to policymakers at home and abroad. USCIB and our member companies have long believed that open, fair, rules-based international trade and investment in all directions can be dynamic forces for economic growth, jobs and better lives. We are proud to serve as the sole U.S. affiliate of Business at OECD (BIAC), the International Chamber of Commerce (ICC), and the International Organization of Employers (IOE). We have supported UNFCCC and the Paris Agreement, alongside the UN 2030 Agenda for Sustainable Development and its SDGs.

We welcome the opportunity to engage in the robust dialogue you invited in your closing comments. A detailed review of just a few examples will quickly demonstrate the positive opportunity for resource recovery in the overall effort to protect the environment and address climate change. USCIB members and staff are available to discuss these important issues with USTR officials.

Best regards,

A handwritten signature in black ink, appearing to read "B. Lowry". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Brian Robert Lowry
Senior Vice President, Innovation, Regulation, and Trade
U.S. Council for International Business