



July 24, 2020

Ambassador Robert Lighthizer  
United States Trade Representative  
600 17<sup>th</sup> Street NW  
Washington, DC 20508

RE: Review of Action: Enforcement of U.S. WTO Rights in Large Civil Aircraft Dispute (Docket Number: USTR-2020-0023)

Dear Ambassador Lighthizer:

On behalf of the Wine Origins Alliance, thank you for the opportunity to provide comments on the enforcement of U.S. WTO rights in the Large Civil Aircraft dispute.

The Wine Origins Alliance is composed of 32 organizations from 11 countries spanning North America, Europe, Australia, and Asia. As noted in our previous comment letters, we strongly oppose the use of tariffs on wine as countermeasures in disputes between the United States and European Union. The U.S. and EU are the two leading wine producers in the world with combined wine exports of more than \$28 billion in 2019, and tariffs on the wine trade between us imposes significant harm on the farmers, vintners, wineries, wholesalers, importers, distributors, warehouses, logistics companies and retailers – many of them small businesses – that bring our distinctive wines to the tables of consumers in the U.S. and the EU.

Wine industries in the United States and the European Union are facing a dire situation at the moment as a result of the global coronavirus pandemic. Between February and April 2020, the U.S. Department of Labor reported that over six million people in the U.S. who work in food service and drinking establishments lost their jobs. Additionally, the U.S. Department of Commerce reported that during that same time period restaurants lost \$27 billion in monthly sales, a decline of 50 percent. In addition, these industries faced an additional tariff bill of more than \$524 million over this time period as a result of U.S. retaliatory measures, according to data from the U.S. Customs and Border Protection. Extending or increasing these tariffs would only compound the catastrophic economic pain that our businesses are feeling at this time.

We understand the intent of the proposed tariffs and the importance of the dispute in which they are being considered. However, imposing tariffs on unrelated products such as wine will only lead to further hurting American businesses and consumers at an already difficult and uncertain time, including by increasing prices and risking shortages of products they wish to purchase. Instead, we urge you to limit the proposed tariffs to products relevant to the matter at hand: aircraft and aircraft parts, which may lead to a swifter resolution. We have raised our concerns to your counterparts in the EU to encourage them to settle the dispute as well, as we understand that a resolution to this dispute will require flexibility by both sides.

In conclusion, we reiterate our complete opposition to tariffs on wine, and thank you for your consideration of our position.

Sincerely,



Giovanni Manetti  
President  
Consorzio Vino Chianti Classico



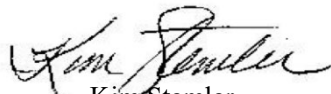
Jim Anderson  
Executive Director  
Missouri Wine and Grape Board



Alison Laslett  
President & CEO  
Santa Barbara Vintners



Bernard Farges  
President  
Conseil Interprofessionnel du Vin  
de Bordeaux



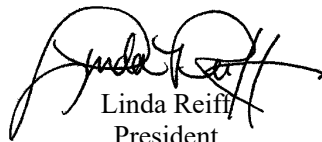
Kim Stemler  
Executive Director  
Monterey County Vintners &  
Growers Association



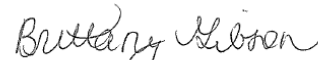
Robert Hansen  
Executive Director  
Walla Walla Valley Wine  
Alliance



Louis-Fabrice Latour  
President  
Bureau Interprofessionnel des  
Vins de Bourgogne



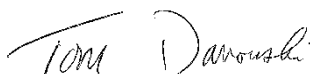
Linda Reiff  
President  
Napa Valley Vintners Association



Britany Gibson  
Executive Director  
Seneca Lake Winery Association



Maxime Toubart  
Co-President  
Comité Champagne



Tom Danowski  
President  
Oregon Wine Board



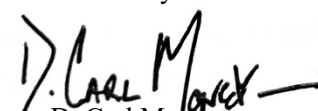
Michael Haney  
Executive Director  
Sonoma County Vintners




Jean-Marie Barillère  
Co-President  
Comité Champagne



Eric Rosaz  
Director  
Inter-Rhône




D. Carl Money  
President  
Texas Wine Growers



James March  
CEO  
Barossa Grape & Wine  
Association



Joel Peterson  
Executive Director  
Paso Robles Wine Country  
Alliance



Péter Molnár  
President  
Council of Tokaj Wine  
Communities



Beltrán Domecq  
President  
Consejo Regulador del Vino de  
Jerez



Gilberto Igrejas  
President  
Instituto dos Vinhos do Douro e  
Porto



Morgen McLaughlin  
Executive Director  
Willamette Valley Wineries  
Association



Chris Chandler  
Executive Director  
Livermore Valley Winegrowers  
Association



Eric Pastorino  
President  
Syndicat des vins Côtes de  
Provence



Kareem Massoud  
President  
Long Island Wine Country



Fernando Salamero  
President  
Consejo Regulador D.O.Ca. Rioja