

**Written Statement of Shea Itzkowitz of TriMe Associates and Jerry Bertram of S. Bertram Foods,  
Before the USITC regarding the PUBLIC HEARING for:**

**U.S GENERALIZED SYSTEM OF PREFERENCES (GSP)  
2012 ANNUAL REVIEW of PRODUCT**

**And**

**COMPETITIVE NEED LIMITATION WAIVERS**

*Annual Review of Broccoli under subheading: (HTS 0710809722, 0710809724, 0710809726)*

*Ref. Investigation 332-538*

February 27<sup>th</sup>, 2013

Mr. Chairman, and fellow commissioners, thank you for giving us the opportunity to present to you our point of view as suppliers for the Kosher food industry in America, which consists of imported frozen broccoli from Ecuador. We hope the Commission will carefully consider our interest and those of our employees, especially in these tough economic times, which would be greatly at stake should a tariff be reinstated on produce from Ecuador. I Shea Itzkowitz of TriMe Foods and Mr. Jerry Bertram who represents S. Bertram are speaking on behalf of our customers and people who work for us.

The Kosher food industry, and broccoli specifically, entails many requirements in order to comply with Kosher certification, but which has not been met by any producer in the broccoli industry in the United States. We have expended much time, effort and research to meet these requirements, and have, consequently, created a market in the United States for the product. As the forerunner in this field, we, therefore, have not interfered with any existing broccoli suppliers or producers in the United States. Production in the United States has not been and will not be affected. Additionally, we have explored different options when we began the arrangements for production and importing the broccoli from Ecuador is our most viable solution.

Furthermore, Americans rely on imports, since the United States alone can't meet the request to supplement the market with a variety of produce year round. Broccoli, which is maintained by health professionals to be one of the most nutritious vegetables, and now with the emphasis on a healthy lifestyle, has been incorporated by many people in theirs, as well as their families', diets. Because broccoli is now imported, they have come to rely on its constant availability and have generated a demand for it. A tariff, unfortunately, will render any product containing broccoli to no longer be affordable to the average consumer as well as to our clientele, which includes rehabilitation homes, schools and families.

However, consumers aren't the only ones who will be affected; for the American employees of our company, and ourselves, the consequences will be devastating. A total of four million U. S. dollars, over the past few years, has been spent to finance this enterprise. Our workforce contains a number of American citizens whose expertise in this domain has greatly assisted us and anything that affects our industry will have a bearing on their livelihoods.

A tariff on these imported goods will not increase production in the United States. Rather it will be hurting our business, American citizens and deplete the availability of these products to the (Kosher) American consumer.

I therefore request that Ecuadorian Frozen Broccoli be included as an eligible article under the GSP program so that it can enter the US without any tariffs.

Thank you for your time, I'm glad to answer any question you may have.