The impact of imports on the industry can be indicated succinctly as follows: In 1966 the imports totaled 248 million pounds. The shipments of the domestic industry for defense purposes, however, totaled 325 million pounds; and again in 1967, with imports totaling 202 million pounds, the estimated shipments of the industry for military purposes were of the order of 400 million pounds. If the large shipments required from the industry for military purposes because of Vietnam had not greatly exceeded the imports, these obviously would have had a disastrous effect on the domestic industry.

During 1966 and 1967 imports constituted between seven and seven and a half percent of the overall domestic market for brass mill products, with much higher percentages for products in common use, such as copper and copper alloy tubes and certain types of flat products. For example, the market for thin wall brass tube for plumbers brass goods has been taken over almost completely by imports. In the case of copper and copper alloy foil which is needed in the manufacture of automotive radiators and other heat exchanger equipment, imports are now 28 percent of the domestic market.

In the first four months of 1968, imports rose further and constituted about twelve percent of the overall market.

With the great advantage which the exporting countries have in labor and related costs, these growing imports present the industry with a very real threat of serious injury.

Exhibit D

SOME SIGNIFICANT COMPARISONS, 1960–66

This tabulation demonstrates the unfairness of the reduction of 50 percent in the import tariffs on brass mill products, as against the smaller reductions in the import tariffs in countries from which about 90 percent of our imports of brass mill products come. The labor rates in these countries are still only a fraction of those in this country. It also shows how absurdly small our exports to these countries have been in comparison to our imports, mainly because their labor and related costs are so much less than ours, not to mention their higher tariffs and other direct and indirect restrictions. Even this small volume of exports consists substantially of particular products which the mills in these countries choose not to make and products which American managed plants abroad require made to American standards. The reductions which were made in the import tariffs of these countries are of no benefit whatsoever to the brass mill industry and have been made apparently as a trading point.

All this information was available to the Trade Information Committee either in the form of statements submitted to it when the Kennedy Round began or from the special technical representative appointed at the request of the Office of the Special Representative for Trade Negotiations. Our special technical representative, however, was at no time consulted.

Exhibit E

COMPUTATION OF TARIFFS, TSUSA 612.31—COPPER BARS, SHEETS, AND STRIP IN COILS

This indicates the absurd limit to which the negotiations in the Kennedy Round have been carried in order to reduce the tariffs on brass mill products to the absolute limit legally permissible by the Trade Expansion Act of 1962, the example being the reductions in tariffs as calculated for copper bars, sheets, and strip in coils (TSUSA 612.31). The tabulation shows, in Column 4, how the tariffs in cents per pound would ordinarily have been lowered by a ten percent reduction each year, by rounding out to one decimal point. But, by taking advantage of Section 254 of the Trade Expansion Act which gives rounding authority when such action is desirable to *simplify* the computation, a relatively involved computation made it possible to reduce the tariffs, as indicated in Column 6, further then contemplated in the staged 50 percent reduction. This excess reduction in the tariffs of one or two tenths of a cent a pound in a duty already too low to adversely affect imports, and lower than the duties in competing nations, certainly comes close to being ridiculous as well as under the circumstances, extremely unfair.