FIELD BLEND SELECTIONS
polyculture from the ground up

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RE: USTR-2019-0003

Joseph Barloon

General Counsel, Office of the U.S. Trade Representative

December 17, 2019

To Whom It May Concern:

We are writing to urge the Office of the U.S. Trade Representative not to impose a 100% tariff on wine imported from European Union (EU) countries (see detail below). Our company, Field Blend Selections, is a small, three-year-old wine importer and distributor based in New York that operates and pays taxes in both New York and New Jersey. Imported wines from France, Germany, Italy, Spain, Portugal, Austria, and Slovenia make up 95% of our sales by revenue and 97% by volume. **A tariff of 100% on all EU wines would put Field Blend Selections - and so many other small and medium businesses in our industry - out of business.**

Field Blend Selections employs five people (two partners, one full time salesperson, and two part time salespeople). We lease office space in New York City and warehouse space in New Jersey. We utilize various American logistics companies to transport wine across the country and overseas. We contract warehouse services, truck drivers, and delivery people through our warehouse to deliver our products. Those products are then sold in over 275 restaurants and retail shops in New York and New Jersey, which rely upon our company and these items to sell to their guests and customers. Our industry is built on hundreds of other similar companies that support jobs across the economic spectrum - warehouse worker to wine salesperson, retail associate to delivery driver. And together, these companies provide a choice to consumers that ensures quality and value.

Both the current 25% tariff and the proposed 100% tariff are, in our opinion, arbitrary, capricious, and completely unrelated to national security. As an American importer, wholesaler, and distributor of small, family-run wineries, we feel that our business is collateral damage in a dispute involving behemoth manufacturers of aircrafts. These tariffs are intended to be punitive measures against European countries, but instead, they are having a calamitous impact on American small businesses, American workers, and American consumers. If further tariffs are put in place, it would mean a devastating loss of revenue, jobs, and taxes to the US economy. We urge you to reconsider this proposal.

Many thanks for your consideration,

Jake Halper
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2204.10.00	Sparkling wine, made from grapes.
2204.21.20	Effervescent grape wine, in containers holding 2 liters or less.
2204.21.30	Tokay wine (not carbonated) not over 14% alcohol, in containers not over 2 liters.
2204.21.60	“Marsala” wine, over 14% vol. alcohol, in containers holding 2 liters or less.
2204.21.80	Grape wine, other than “Marsala”, not sparkling or effervescent, over 14% vol. alcohol, in containers holding 2 liters or less.
2204.22.20	Wine of fresh grapes of an alcoholic strength by volume <=14% in containers holding <2 liters but not >10 liters.
2204.22.40	Wine of fresh grapes of an alcoholic strength by volume >14%, in containers holding <2 liters but not >10 liters.
2204.22.60	Wine of fresh grapes of an alcoholic strength by volume <=14% in containers holding >10 liters.
2204.22.80	Wine of fresh grapes of an alcoholic strength by volume >14% in containers holding >10 liters.
2204.29.61	Wine of fresh grapes of an alcoholic strength by volume <=14% in containers holding >10 liters.
2204.29.81	Wine of fresh grapes of an alcoholic strength by volume >14% in containers holding >10 liters.
2204.30.00	Grape must, nesoi, in fermentation or with fermentation arrested otherwise than by addition of alcohol.