



## U.S. CHAMBER OF COMMERCE

### **Policy Priorities for the New European Commission** *Promoting Competitiveness & Transatlantic Cooperation*

#### **I. Introduction**

The economic ties between the United States and the European Union constitute the most important bilateral commercial relationship on Earth. Over 16 million jobs on both sides of the Atlantic are created by two-way investment or rely on the \$3.75 billion in two-way trade that crosses the ocean each day. This relationship, based on shared values of free enterprise, respect for the rule of law, and a time-tested reliance on democratic capitalism, has brought unprecedented peace and prosperity to the people of Europe and the United States for over seven decades.

Yet today the relationship is being tested on multiple fronts, both commercial and geostrategic. Rather than continuing to grow apart, it is incumbent upon both the U.S. and EU to move decisively to resolve differences where possible and to focus attention on shared opportunities. Both sides should work quickly to deepen our commercial ties, pursue effective sustainable development strategies, address China's unfair practices, update the WTO, and ensure adherence to principles of non-discrimination and national treatment as we craft rules for a digitalizing global economy that is evolving at an unprecedented pace.

There are significant political divergences on key issues, to be sure, and the two sides frequently disagree on the tactics to address global challenges; but in fact, our policy objectives are largely in sync, as are our shared commercial interests. If the U.S. and the EU are to effectively address these issues, we must work together.

As the world's largest business organization, the U.S. Chamber of Commerce stands ready to work with the new European Commission as it pursues an ambitious agenda for the next five years. This paper sets forth key priorities on a range of issues. First and foremost, it is essential that the EU and the U.S. recommit to an ambitious agenda to remove unnecessary hindrances to transatlantic trade and investment. In addition, policymakers in Brussels and across the member-states should prioritize strengthening the Single Market—including for services and the digital economy; promoting fair competition; and pursuing a balanced and effective sustainable development strategy.

Robust intellectual property protection across all sectors, and closer regulatory cooperation in the life sciences sector, are also important priorities. Efforts to avoid unnecessary divergences in tax and defense policy and strengthening opportunities for small and medium-sized companies also are paramount. Maintaining close economic and strategic cooperation with the UK after Brexit will be important to preserve growth and stability. Initiatives to help promote effective workforce development opportunities to prepare workers for a fast-changing global economy must also be prioritized. Finally, through open and honest engagement across the Atlantic, the U.S. and EU can effectively tackle global challenges like China's state capitalist model and the urgent need to reform the World Trade Organization.

## **II. Transatlantic Trade and Regulatory Cooperation: Defining the Way Forward**

A rejuvenated transatlantic relationship must begin at home, with both sides working to remove the economic barriers between us. In July 2018, Presidents Trump and Juncker announced a plan to address several longstanding bilateral trade irritants. The two presidents agreed to work on eliminating tariffs on industrial products; developing new approaches to jointly set standards for new technologies; simplifying product testing requirements by recognizing each other's conformity assessment bodies; and working together to update the WTO and confront China's unfair practices at home and abroad.

Some progress has been made on this positive agenda, notably in the conformity assessment negotiations, but more movement is urgently needed. U.S. and EU policymakers should seize the opportunity to lower tariffs and resist moves to increase barriers. The U.S. should lift its Section 232 tariffs on imports of European steel and aluminum, and the EU should respond by lifting its retaliatory measures. These tariffs are counterproductive and have served mainly to antagonize allies. Instead, the U.S. and EU should redouble efforts to address Chinese overcapacity, including via the trilateral dialogue with Japan. Actions that would inhibit imports of European autos and auto parts would have a devastating impact, given the volume of trade involved, and they should be avoided. The U.S. and EU should also strive to reach negotiated settlements that avoid or remove tariffs in the context of ongoing bilateral WTO disputes.

The U.S. and EU have a unique opportunity to establish best-in-class customs and trade facilitation procedures, taking advantage of the latest technologies to expedite the movement and release of goods and moving the duty and tax collection process away from the border. Collaboration on the non-controversial issue of trade facilitation could

prove a useful opportunity to build trust and confidence at the technical level, setting the stage for future cooperation on broader trade issues.

The United States and European Union should also partner to establish common standards where none yet exist, and pursue mutual recognition of existing regulations where different approaches meet common regulatory standards. For example, as the automotive industry shifts its focus to electric and autonomous vehicles, there are ample opportunities for cooperation, including development of smart infrastructure, new communications systems, and safety standards.

The two sides should also expand existing regulatory cooperation and data-sharing practices in the life sciences sector, building off the recent success of the U.S.-EU mutual recognition agreement on good manufacturing practices for pharmaceuticals. That agreement should be extended to include vaccines and veterinary medicine. Expanded regulatory cooperation in cybersecurity, medical devices, and biotechnology likewise would have a substantial positive impact on both sides of the Atlantic. There are other effective models to draw on for other sectors, such as the EU-U.S. Financial Regulatory Forum. Dialogue and cooperation can and must proceed whether or not the two sides ultimately pursue a comprehensive trade agreement. Indeed, better regulatory cooperation could facilitate greater collaboration in multilateral fora, such as the OECD, UN, and WTO. These efforts should draw, wherever possible, on the work of voluntary, market-driven, and internationally recognized standards—and should always include opportunities for stakeholder engagement.

The American business community encourages the EU to work closely with U.S. authorities and relevant business stakeholders to preserve common air cargo aviation security standards, procedures, and data sets based on the current air cargo advanced screening (ACAS) standards. The current system has proven to be a robust and effective framework that serves its primary objective—avoiding security concerns—best. It should remain a separate framework and not be negatively affected by the inclusion of procedures and data that serve other purposes, such as customs and trade compliance functions.

Sustainable development is another area ripe for greater transatlantic cooperation. The U.S. and EU should collaborate closely with stakeholders to incentivize investments in the circular economy and promote resource efficiency. Transatlantic cooperation on sustainable agriculture, energy, waste, and water policy will make it easier for American and European companies to lead global efforts to address key resource challenges and a changing climate, while enabling economic growth and job creation.

Finally, the U.S and EU should support ambitious and high-level intellectual property standards, and work together to strengthen IP rights in third countries.

### **III. Energy Policy and Sustainable Development**

The incoming European Commission has underlined its clear intention to focus heavily on climate action in virtually every aspect of its agenda. Recent experience in a number of countries underlines the need for a clear plan to promote economic growth and address climate change in tandem in order to sustain competitiveness. Notwithstanding governmental disagreements about the Paris Agreement, cooperation with the United States will be an essential part of Europe's climate and energy strategy. Indeed, it is essential that the U.S. and EU work together in multilateral fora and future trade agreements with third countries on issues like green procurement and green finance.

The U.S. and EU should continue to expand and promote cooperation and trade in energy, including boosting exports of U.S. liquefied natural gas, alongside new investments in energy efficiency and research and development for new technologies including battery storage and solar. U.S. natural gas can help lessen Europe's overreliance on Russian energy exports and serve as a bridge fuel as Europe transitions to a low carbon economy.

European and American companies can also lead the way by increasing investments in the circular economy. Policymakers should assist these efforts by providing economic incentives that promote sustainable development objectives. The U.S. and EU should work together to streamline regulatory efficiency requirements to ensure the approval and commercialization of new processes, products, and services that support the circular economy.

The EU's future climate strategy should be closely coordinated with stakeholders. For example, any new product-specific regulations should take into account economic realities, life cycle analysis, and include credible transition timelines to protect European economic growth and jobs. If Europe moves too quickly, it could call into question future investment decisions and cause manufacturers to reconsider whether they can continue to competitively produce goods in the EU. Instead of policies that ban certain elements or materials—potentially disrupting longstanding supply chains—the EU should focus on incentivizing innovation to address environmental challenges.

Transatlantic cooperation will be especially important on a sector-by-sector basis. For example, in aviation, the U.S. and EU should continue to collaborate on implementing the International Civil Aviation Organization's Carbon Offsetting Reduction Scheme

in International Aviation (CORSIA) as the exclusive market-based system that applies to emissions in international aviation. The two sides should also continue working together to promote new aircraft design standards that focus on reducing greenhouse gas emissions.

European efforts to address climate change, lower emissions, and promote sustainable development are vital; indeed, American companies are innovating and investing heavily in new technologies to address their own carbon footprints and to help achieve these objectives. These efforts should be encouraged and facilitated. That said, a possible “Carbon Border Tax” could have significant unintended consequences if it is applied in a WTO-inconsistent manner. Any such measure must be designed in a way that effectively balances environmental and economic imperatives. Any new tax should be crafted in concert with stakeholders in an open and transparent fashion, and must not be applied in a discriminatory manner or act as a barrier to trade.

#### **IV. Advancing the European Digital Policy Agenda**

Continued transatlantic cooperation is essential across a range of digital policy priorities. Together, the U.S. and EU must reaffirm the Privacy Shield, which ensures U.S. companies, in particular small and medium-sized enterprises, are faithfully adhering to European privacy requirements in order to facilitate essential data transfers across the Atlantic. Consumers and companies on both sides of the Atlantic rely on the Privacy Shield every day to ensure continued access to information and essential services—it must be maintained. Similarly, the U.S. and EU should finalize an agreement on the lawful access to data for law enforcement. The e-Evidence negotiations underway under the U.S. CLOUD Act should be successfully resolved during the first half of the Commission’s tenure. Companies should not be forced to decide whether to break U.S. or European law when presented with lawful requests to access digital evidence. It is in both sides’ clear interest to remove legal ambiguity and facilitate greater cooperation.

As both the U.S. and EU cope with new and growing challenges in cybersecurity, policymakers should pursue effective collaboration, share best practices, and invite active stakeholder engagement. Europe and the U.S. should engage in dialogues, such as those at the OECD, on common light-touch and risk-based approaches to artificial intelligence in order to promote innovation while ensuring legitimate regulatory objectives are met. Given the fast-moving nature of commercial development in this sector, involving business and consumer interests in these dialogues is essential. The Chamber’s recently released policy principles governing the use and regulation of artificial intelligence should serve as a model.

Malicious cyber activity against public and private institutions across the EU continues to increase, and the EU should continue to make meaningful progress on cyber risk management. Passage of legislation that promotes common approaches to the cybersecurity of network and information systems and information communication technology, together with the establishment of a permanent mandate for the EU Agency for Cybersecurity (ENISA), made welcome progress towards aligning member-state approaches. American companies urge the Commission to build on these efforts and commit to pursuing policies that promote alignment with open, transparent and consensus-driven international frameworks, such as the U.S. National Institute of Standards and Technology's Cybersecurity Framework. The Commission's continued engagement with the private sector on risk management is the best approach to manage cyber risk and increase network resilience. Such international cooperation enhances the private sector's ability to innovate in ICT, services, and products, and will ultimately strengthen the Digital Single Market.

The Chamber encourages the new Commission to pursue the fair and consistent application of the General Data Protection Regulation by member-states and Supervisory Authorities. As negotiations on ePrivacy Regulation (ePR) enter into their third year, the new Commission should reassess the proposed legislation, as fundamental questions regarding its scope, application, definitions, and basis for processing remain unanswered. The new Commission should take bold steps to address the profound legal uncertainty created by the proposal across Europe's digital economy, and ensure that stakeholder viewpoints are taken into account as the ePrivacy debate continues.

Beyond bilateral engagement, the U.S. and EU should continue to partner in third countries to ensure the Internet remains globally connected, secure, and interoperable. That cooperation should include a systematic and concerted effort to oppose data localization in other jurisdictions, including in key markets in the Indo-Pacific and Africa. Brussels and Washington must partner to ensure that the WTO moratorium on customs duties on electronic transmissions is respected, renewed, and made permanent. Finally, the U.S. and EU must lead the WTO discussions on e-commerce to secure an ambitious outcome that sets new global standards for digital trade and includes binding trade facilitation measures.

## **V. Strengthening the EU Single Market**

The new European Commission has a unique opportunity to build off the successes of the outgoing executive—such as further integrating the Digital Single Market—while also making further progress towards completing the single market for services, and

building the Capital Markets Union. The new Commission should focus on removing barriers to the free flow of goods, services, capital, people, and data across the EU. Reinforcing and deepening the single market will bolster the European economy at a critical moment—against the backdrop of a potential disorderly Brexit and rising global trade tensions.

With the departure of the UK, the EU will lose direct access to its most integrated capital market, in London. This should be a call to action to finalize the Capital Markets Union agenda. By further integrating Europe’s capital markets, small companies will have greater access to the liquidity they need to scale up. By providing a more integrated regulatory framework, financial institutions will be better insulated from future internal or external economic shocks. At the same time, policymakers should recognize that the use of phrases like financial services “autonomy” or “sovereignty” risk acting as deterrents to foreign investors. Instead, the development of the Capital Markets Union should be driven by a desire to attract more competition and capacity across the region. Also, when implementing post-Brexit reforms, the EU must minimize the risks of unintended impacts on third country jurisdictions beyond the UK. The EU and U.S. should continue to collaborate on financial regulatory issues, without imposing unnecessary or extraterritorial regulations on market participants, and without undue restrictions on existing market access provisions or the broadening of their scope.

Moreover, as the EU continues its efforts on sustainable finance, it should continue to work with industry stakeholders and international governments to ensure a coordinated approach and to avoid overly prescriptive requirements.

The EU should continue its efforts to integrate its Digital Single Market to allow consumers and businesses to fully realize the potential of Europe’s digital transformation. That means a renewed focus on digital literacy and skills, as well as the avoidance of new restrictions on cross-border data flows. The EU should insist on eliminating data localization requirements in any future trade agreements, and remove remaining barriers to the free movement of data within the single market, across all sectors. This will help Europe capitalize on its competitive advantage in the industrial Internet, connected devices, the development of smart cities, and advanced manufacturing. The EU should also expand stakeholder consultations to ensure that views from a wide range of industries, including traditional manufacturers, are included in future debates.

The EU should seize its chance to strengthen its existing framework for protecting intellectual property rights to encourage and reward innovation. European companies excel in developing new medicines, innovative industrial products, and the arts. EU laws protecting their IP should be reinforced at home and via ambitious IP chapters in

future trade agreements. Unfortunately, the previous Commission's amendments to the supplementary protection certificate regime sent a dangerous signal that Europe is willing to weaken its commitment to IP and innovators. The next Commission should refrain from any further weakening of IP incentives relating to the bio-pharmaceutical industry, and ensure that other important tools such as rules for standard essential patents continue to support genuine innovation. As global leaders in intellectual property protection, the U.S. and EU should partner to ensure IP rights are protected in third countries.

Finally, the EU must avoid the temptation of following the United States down the costly and disruptive road to widespread class-action litigation. As it considers measure for EU-wide collective redress, European policymakers should pursue common safeguards against litigation abuses and further develop alternative dispute resolution systems that are cost-effective, quick and fair for both consumers and businesses—while ensuring the benefits of any litigation go to the consumers who are actually harmed, rather than predominately to their lawyers and litigation funders.

## **VI. Life Sciences and Health Policy**

The EU and the U.S. enjoy a shared competitive advantage in the life sciences sector, and the Commission should pursue policies that builds upon these successes. This would include continuing regulatory cooperation efforts in the pharmaceutical and medical device sectors.

In pharma, the existing mutual recognition agreement on good manufacturing practices for testing facilities should be extended to cover vaccines and veterinary drugs. The two governments should also expand existing data sharing agreements to facilitate cooperation between the U.S. Food and Drug Administration and the European Medicines Agency.

For medical devices, the two sides should finalize an agreement on a single audit and develop unique indicators for new devices that would facilitate the tracking and tracing of traded goods that meet all relevant regulatory requirements. The European Commission must also take steps to ensure the successful implementation of the Medical Device Regulation (MDR). With six months left before the transition period is set to expire, there are far too few approved “Notified Bodies” designated to authorize new devices in accordance with the new regulations. Renewals of current Medical Device Directive (MDD) product licenses and approval of new products under the MDD are also at risk. These problems are exacerbated by the UK's departure, since many of the EU medical device regulators are located in the UK. In addition, there are

too few implementing regulations in place, leaving manufacturers uncertain about how to interpret many of the new regulations. The two-year delay to the European database on medical devices (EUDAMED) is further evidence of the problems with MDR implementation. Therefore, extending the transition or placing additional MDD-certified products into the four year MDR grace period may be necessary to maintain the supply of and patient access to high-quality, life-saving devices.

Additionally, the Commission should expand its focus on and promotion of e-health and the digitalization of the life sciences sector. By investing in innovative, digital solutions, the EU can promote better health outcomes, while also lowering the costs of care over time.

In order to continue to provide patients access to the latest and most innovative medicines, the EU must not only ensure that IP protections remain robust, but it should also coordinate a review of member-states' pricing and reimbursement systems. The review should ensure that national systems fairly reflect a reasonable return for the value of investments in cutting-edge R&D and maintain and enhance Europe's reputation as a hub for development of innovative medicines—by both domestic manufacturers and international investors.

For the biotechnology and chemical sectors, it is essential that the EU recommit itself to following its own legally mandated timelines for science-based approvals of new products. For too long, bureaucratic hurdles have hindered new products from accessing the European market, and non-science based barriers to trade are a growing irritant in the transatlantic relationship. By reaffirming and following the existing legal timelines for approving new products, the Commission could remove a major impediment to transatlantic trade while providing access to new products for European companies and consumers.

## **VII. Bridging Transatlantic Divides on Tax Policy**

The next European Commission is taking office against the backdrop of several important international tax policy debates. The EU should play a productive role in coordinating member-states' approaches to these discussions—and limit the prospect for further transatlantic divergence.

In light of the fast-changing nature of the global economy, an informed and inclusive dialogue on how to modernize the international tax system is in order. However, consideration of any measures should occur in multilateral settings and should be adopted only after constructive dialogue with stakeholders. Unfortunately, countries

across Europe are implementing or considering different versions of digital services taxes (DSTs). France's unilateral DST, as well as those in Spain, Italy, Austria, the Czech Republic, and the UK, erode trust and threaten to undermine progress towards a multilateral agreement at the OECD. The imposition of discriminatory taxes that target specific sectors, disproportionately affect foreign companies, or threaten to subject companies to double taxation also would undermine Europe's attractiveness as a place to invest.

The U.S. government has already proven its willingness to pursue unilateral trade measures to address international tax disputes through Section 301 investigations. The U.S. and EU must work together to limit collateral damage, and commit to finding an international agreement at the OECD.

Another tax policy challenge that will affect companies of all sizes is the forthcoming implementation of the revision to the VAT Directive and the removal of the "de minimis" for VAT on importation, due to be applied as of January 1, 2021. Unfortunately, there are widespread divergences between member-states in their level of preparedness to implement the Directive on time. The implementation date should be delayed until all member-states have proven their customs systems are prepared for the significant changes.

Additionally, the VAT legislation should be amended and improved by: pursuing the work on a simplified seller registration model for low-value imports that would provide VAT transparency for all EU consumers, move VAT collection away from the border, minimize VAT-related customs processes for low-value imports, and ensure non-discrimination between EU and non-EU sellers. All of these updates would simplify and facilitate the import process to the benefit of all European customers and all companies operating across the EU single market.

## **VIII. European Defense Policy: Promoting the Alliance and Ensuring Continued Openness**

Facing new and expanded threats to its regional security, Europe is right to pursue a more assertive foreign and security policy. However, as it seeks to boost strategic capabilities and defense resources, it is vital that the EU's efforts are coordinated with and complementary to NATO's priorities.

The NATO alliance remains the cornerstone of transatlantic security cooperation. In light of new threats, including cyberattacks, disinformation campaigns, instability in the Middle East and a revanchist Russia, continued transatlantic cooperation is essential.

Just as Brussels frequently calls for transparency and non-discrimination in U.S. defense procurement, the EU's new Permanent Structured Cooperation (PESCO) initiative and its European Defense Fund (EDF) must not inhibit fair participation by U.S. defense companies.

## **IX. Sustaining Close Economic Relations with the UK after Brexit**

After Brexit, the UK will remain an essential economic and strategic partner for both the U.S. and the EU.

Given the deeply integrated cross-Channel and transatlantic supply chains, as well as flows of services, data and people, close economic relations between the EU, UK, and U.S. will remain essential. The EU and UK should quickly outline the terms of their future relationship, and it is imperative that the transition period extend until the future relationship is in place.

After the UK leaves, the EU will need to establish new and innovative approaches to collaborate with third countries on a range of issues, including trade and regulatory policy, to prevent unnecessary and unintended divergences. As these new avenues are developed, the EU should consider including close trading partners and major investors like the United States in these efforts.

## **X. Promoting Skills, Education, and Workforce Development**

Given the rapidly evolving nature of the global economy, an EU strategy to support skills training and workforce development is essential. Technological advancements and demographic shifts are forcing companies and governments alike to develop new strategies to attract and retain talent and to re-skill where necessary.

The EU should develop a new strategy that builds on the Skills Agenda launched in 2016 by scaling those practices which are delivering results, and developing new ones that address the increased pace of change. The costs of such a program would be recovered many times over through increased productivity, competitiveness, and boosts in social welfare.

The EU and member-states should work closely with industry and educators to design tailored programs and curricula to ensure that workers have the knowledge and expertise needed to succeed in the economy of today and tomorrow, and to help

workers manage disruptions to their careers. Importantly, any R&D funding opportunities to plan and execute this skills strategy should be open to all bidders, including U.S. investors who are eager to expand their European presence and workforce.

## **XI. Encouraging Opportunities for Small and Medium-Sized Enterprises**

While companies of all sizes will benefit from greater transatlantic cooperation, small and medium-sized enterprises (SMEs) stand to benefit significantly. Smaller companies are less able to build products to two different regulatory requirements or bear the compliance and marketing costs necessary to expand to new markets. SMEs also suffer the most harm from transatlantic trade tensions since they are more reliant on trade than investment.

In an effort to assist SMEs as they strive to expand their business across the Atlantic, both the EU and the U.S. should build on existing programs—such as the U.S.-EU Small Business Dialogue. Policymakers should also make export promotion information and support more widely available. Companies who avail themselves of existing programs rave about their benefits, but these resources are not well known or publicized among small business owners.

Given the growing importance of transatlantic trade based on e-commerce, the business community also welcomes further discussions on the EU's import one stop shop (IOSS) implementation, to make sure that IOSS provides significant incentives for traders and also reduces customs-related obligations for delivery intermediaries when implemented. The ultimate objective should be to leverage the potential of e-commerce for SMEs and consumers on both sides of the Atlantic, by simplifying VAT procedures.

## **XII. Fostering a Pro-Competition Environment**

Some member-state capitals are calling for the return of an active European industrial policy that threatens to disrupt the benefits of the single market in an ill-advised effort to promote “national champions.” Calls to change competition rules to tilt the playing field aren't likely to advance Europe's competitiveness on a sustained basis, and they send the wrong message to other countries. Instead, the EU should remain committed to maintaining and strengthening its fair, transparent, non-discriminatory, rules-based system that discourages illegal state aid or anticompetitive business practices based on compelling evidence of economic harm to consumers.

### **XIII. Tackling Global Challenges: Cooperating to Address China, Reforming the WTO, and Pushing the International Trade Agenda Forward**

Given a range of shared global challenges, the U.S. and Europe must work together to effectively defend the rules-based global trading system. The EU and U.S. share the same concerns about the inconsistency of China's economic model with our values-based democratic free markets. This effort should prioritize securing meaningful WTO reforms to strengthen the institution and ensure it is purpose fit for the challenges of the present and future. Working with close partners like Japan and Canada, the U.S. and EU should define new rules to: define and counter unfair state subsidies, prevent forced technology transfers, fight to protect and enforce intellectual property rights, and defend against unfair advantages enjoyed by state-owned enterprises and national champions. Only through a joint approach and by forming common cause with other partners can countries hope to effect lasting changes.

The WTO must demonstrate its ability to coordinate new market opening agreements. One significant opportunity is the ongoing negotiation on e-commerce. U.S. and European leadership will be critical in order for those talks to be concluded successfully. Similarly, the U.S. and EU must redouble efforts to ensure the WTO's dispute settlement system continues to function. Businesses across the world benefit greatly from the stability provided by an effective, rules-based, global trading system. Further, the EU should work with partners, including the U.S., to jointly define what constitutes an unfair state subsidy, and then work to promote this new shared understanding multilaterally and incorporate it into future trade agreements. An agreement expanding the definitions of unfair state subsidies, for example, would be an important first step as part of the ongoing trilateral dialogue between the U.S., EU, and Japan.

In addition, the EU should reinforce the open global trading system by finalizing new agreements with Australia and New Zealand and by ratifying recently concluded FTAs with Vietnam and Mercosur. A potential focus on trade enforcement, alone, would undermine European leadership in this area.

Moreover, the EU should continue to assist member-states in their efforts to develop robust investment oversight regimes to properly vet foreign state-owned enterprises from acquiring critical infrastructure or technology. The U.S. decision to strengthen investment oversight by the Committee on Foreign Investment in the United States (CFIUS) and to tighten export controls can be instructive.

Finally, on sanctions policy, it is essential that the U.S. and EU continue to coordinate our approaches to avoid unintended consequences. In the case of Russia, our cooperation to date has been highly effective and should be continued.

#### **XIV. Conclusion**

There are innumerable ways to strengthen the economic partnership between the U.S. and the EU. There are also grave risks if the two governments continue down a path of tit-for-tat measures and divergence on the critical global issues of the day. As it strives to strengthen the Union, the new European Commission has ample opportunities to work with American and European businesses, and with the U.S. government, to ensure that the world's most important bilateral commercial relationship continues to thrive.