



Testimony of Stephen Lamar  
Appearing on Behalf of  
Accessories Council  
American Apparel & Footwear Association  
Council of Fashion Designers of America  
Travel Goods Association

GSP Hearing on Thailand  
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Thank you for the opportunity to testify today.

My name is Steve Lamar. I am the Executive Vice President at the American Apparel & Footwear Association (AAFA), the national association of the apparel and footwear industry. I am also testifying today on behalf of the Travel Goods Association (TGA), the Accessories Council, and the Council of Fashion Designers of America (CFDA).

The Accessories Council is a not-for-profit, international trade organization established in 1994. Our mission is to stimulate global consumer awareness and demand for fashion accessory products. The Council serves the industry globally which generates over \$50.8 billion dollars annually in the United States alone. Over the past 20 years, membership has grown internationally to include over 280 companies and organizations, representing the world's leading brand names, designers, publications, retailers and associated providers for the accessories, eyewear and footwear industries.

AAFA is the national trade association representing apparel, footwear and other sewn products companies, and their suppliers, which compete in the global market. Representing more than 1,000 world famous name brands, we are the trusted public policy and political voice of the apparel and footwear industry, its management and shareholders, its nearly four million U.S. workers, and its contribution of more than \$400 billion in annual U.S. retail sales. AAFA provides exclusive expertise in trade, brand protection, and supply chain & manufacturing to help our members navigate the complex regulatory environment and lower costs. Members gain unparalleled access to information and

exclusive insights on regulation and policy, and premier opportunities for networking and collaboration.

CFDA is a not-for-profit trade association, founded in 1962, whose membership consists of more than 500 of America's foremost womenswear, menswear, jewelry and accessory designers. Its mission is to strengthen the impact of American fashion in the global economy.

TGA is the international organization for the travel goods industry. Members include manufacturers, distributors, retailers, promoters, sales representatives, and suppliers of luggage and travel products, casual bags, briefcases and computer bags, and business and travel accessories for travelers.

Together our members span the industry of U.S. companies that make, market, and sell travel goods, which we define broadly as luggage, handbags, backpacks, briefcases, and related fashion accessories.

We are appearing today to urge that Thailand not lose their GSP eligibility status with respect to travel goods and related fashion accessories. GSP benefits for U.S. travel goods and accessories imports from Thailand have benefitted American businesses, American workers, and American consumers. GSP benefits with respect to these countries will continue to be important in the years to come. We are sensitive to the underlying workers' rights and will do everything we can to encourage the Royal Thai Government to improve its worker rights practices.

Through the power of global value chains, the travel goods industry supports approximately 100,000 U.S. workers – in such diverse areas as design, compliance, marketing, IT, and retail. Although there are some manufacturing activities, which are supported by imports, there is virtually no large scale commercial travel goods production in the United States, nor has there been for decades.

At more than 99 percent important penetration, by volume, the travel goods industry today is largely dependent upon China. Until July 2017, when President Trump declared all eligible U.S. travel goods imports duty-free from all GSP countries, China's share of the U.S. import market was 85%. Companies in the travel goods industry had few viable options (besides Vietnam) for the large scale commercial production of travel goods outside of China. Much of the industrial capacity – not just for final assembly but also for materials and components – has been concentrated in China for years. Long term development of specialized skill sets, especially for more complex items, and convenient shipping only added to China's advantage. Finally, the industry's relatively small size – compared to larger industries, such as apparel, footwear, toys, and electronics – made it difficult for travel goods producers to develop factory capacity in other countries.

Making travel goods eligible for GSP duty free benefits in countries such as Thailand changed all that.

Our members pay a high tax on travel goods imports. In June 2017, the month before President Trump's historic determination, travel goods were assessed an effective average duty rate of 12.7%, with most duties ranging between 17.6% and 20%. Compare this to the average for all goods imported into the United States: 1.4%

Duty-free access under GSP gave the industry its first real opportunity to diversify away from China to build factory capacity and skills in other countries, and to save on our crushing duty burden. And the industry has taken advantage of that opportunity. Since 2017, China's share of the U.S. travel goods import market has dropped 3 percentage points – to 82 percent, and it continues to drop.

These duty savings now mean that companies can invest in the development of factory capacity in countries other than China. As one would expect, the drop in China's market share has been accompanied by an increase in the market share of GSP countries. The percentage of U.S. imports of travel goods from GSP countries has grown significantly in the past few months, from 5 percent of imports before GSP, to just under 9 percent today. And it is still growing.

Consumers are also poised to see the benefits. Lower duty bills mean companies can pass along the savings in the form of lower prices or invest in innovation and design to deliver high valued products at the same price point. Of course, companies can also return those duty savings to shareholders in the form of dividends or employees in the form of new hires and salary increases. Based on data from the first nine months of 2018, U.S. companies importing travel goods are likely to save almost \$200 million in duties in 2018 thanks to GSP, savings that will translate into lower prices for U.S. consumers and more jobs for U.S. workers.

In the past few months, GSP's ability to help companies diversify from China has taken on added significance as the Administration has now included all travel goods on Tranche 3 of the China Section 301 punitive tariffs. Starting in September, the high volume of travel goods still being imported from China face a 10 percent additional tariff (that is on top of the already high tariff). This punitive tariff rises to 25% in 33 days.

To see how dramatic this impact is, let's look back at the tariff rates I mentioned before. In June 2017, the average rate was 12.7%. In July 2017, when the proclamation for travel goods for all GSP countries took effect, the average rate dropped to 11.7% and it has remained below 12% for every month through August 2018 (and had even dropped below 11% on three occasions). Yet, in September 2018, when the new 10% China 301 took effect for the last 6 days of the month, the tariff rate shot back up to 12.2%.

There is no question that the China tariffs have now offset the gains companies were starting to make through the GSP program. This will get many times worse in just a few weeks as the punitive tariff rate more than doubles to 25%. This is bad enough as it introduces new costs that are not easily absorbed by supply chains that already operate on razor thin margins. But removing GSP from Thailand, especially since other top GSP travel goods suppliers are also facing GSP reviews, would be devastating to the industry and the American companies, workers, and consumers it serves.

Let me share some country specific information for Thailand:

While we are sympathetic to the concerns raised with respect to workers' rights in Thailand, and urge the Royal Thai Government to improve its worker rights practices, we don't support removal of GSP benefits for travel goods imports from Thailand.

Thailand has long been in the luggage business. The addition of travel goods to the GSP program put Thailand back on the map as a major supplier, making it the 7th largest supplier of travel goods under GSP.

The loss of GSP for Thailand would hurt U.S. travel goods firms and their American workers.

Talking with one small luggage manufacturer, for example, they employ 12 workers, with a significant amount of their sourcing from Thailand. Withdraw of GSP benefits would be devastating for their company as they either must charge higher prices, and lose business, or try to absorb the high duties, by laying off workers.

In conclusion, I would like to reiterate five main points:

1. Virtually all travel goods sold in the United States today are imported;
2. China dominates the travel goods industry, and will continue to do so without GSP;
3. We pay high taxes on these imports, with duties on most travel goods ranging between 17.6% and 20%; and
4. With GSP, the industry had its first real opportunity to diversify away from China.
5. The China 301 tariffs on travel goods, makes GSP for travel goods more important than ever.

For these reasons, we urge that GSP for travel goods be left intact for Thailand.

Thank you again for the opportunity to testify. I would be happy to answer any questions.