



UNITED STATES
FASHION INDUSTRY ASSOCIATION

July 21, 2017

Mr. Ed Gresser
Chair of the Trade Policy Staff Committee
Office of the United States Trade Representative
600 17th Street, NW
Washington, DC 20508

Ref: USTR-2017-0008-0001 - Request for Comments: Public Hearing Concerning Out-of-Cycle Review of Rwanda, Tanzania, and Uganda Eligibility for Benefits under the African Growth and Opportunity Act (AGOA)

Dear Mr. Gresser:

On behalf of the joint associations representing apparel brands and retailers, we are writing to offer post-hearing comments regarding the review of AGOA eligibility for the three East African Community (EAC) members of Rwanda, Tanzania, and Uganda.

We wish to reiterate in the strongest possible terms our hope that the Out-of-Cycle Review (OCR) NOT result in the suspension or termination of AGOA benefits for these three countries. Continuing access of these countries to the U.S. market supports the short and long term investment and sourcing operations for many of our members. As U.S. global value chains increasingly run through Africa, a growing number of U.S. jobs are depending on the continuity, stability, and predictability of this program.

At the same time, the United States has a strong interest in ensuring the sustainable economic growth of these countries by providing jobs, reinforcing market-based and democratic institutions, and ensuring the development of communal and regional networks. AGOA – by providing duty free access for African made apparel to the U.S. market – is an important foundation to these goals. Interrupting that access would harm our members' ability to operate in these countries, which would in turn adversely affect progress in achieving these goals.

We were pleased to see that Kenya satisfactorily resolved the concerns that the U.S. Government had raised, and look forward to working with the Kenyan government to ensuring ongoing compliance. It is our hope that the U.S. government and the other AGOA beneficiary countries in the EAC can work together, and with dispatch, to achieve a similar outcome to keep AGOA benefits from being interrupted AND to preserve the EAC countries sovereign abilities to regulate trade in used clothing.

We stand ready to work with all parties to facilitate a speedy resolution.

Sincerely,

American Apparel & Footwear Association
National Retail Federation
Retail Industry Leaders Association
U.S. Fashion Industry Association