

Customs Report

By Thomas Crockett • Jul 30, 2025

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A few quick updates on the FDRA Trade & Logistics Strategy Summit, forced labor enforcement, and a few recent classification and origin decisions.

Join us in Portland to talk trade and tariff strategy

FDRA

SHOE TRADE & LOGISTICS STRATEGY SUMMIT

September 17, 2025 • Castaway Portland

We have released the agenda for our annual [Portland Shoe Trade and Logistics Strategy Summit](#) on September 17th. A few key takeaways:

• Adidas General Counsel & VP of Government Affairs, Kurt Tandan, will open the event with a keynote on navigating the global trade landscape.

• The event features all of the great FDRA insight and intel ... with a fun Portland twist: Deadstock Coffee with sneaker designs, real-world trade scenario breakout sessions, *Who Wants to Be a Shoe Millionaire?*, and more!

• We will cover critical topics like de minimis changes, UFLPA enforcement, economic forecasts, PFAS, Prop 65, and port issues.

One more thing:

The day before, we are holding two additional Portland events: The [Shoe Sustainability & Innovation Summit](#) and [Brews & Shoes](#) networking and trivia night. (Combo tickets for all 3 events [here](#)).

View the agenda

, see the photos of last year's event, and register today:

Trade & Logistics Summit

KPMG

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Forced labor enforcement news

On July 1st, the Department of Homeland Security (DHS) updated its searchable tool of Uyghur Forced Labor Prevention Act (UFLPA) stats.

By the numbers: So far in fiscal year 2025, 377 apparel, footwear, and textile shipments have been detained.

- 182 (48%) of those shipments have been denied, 67 (18%) have been released, and 128 (34%) are still pending.
- Since the UFLPA went into effect in June 2022, 2,229 apparel, footwear, and textile shipments have been detained.
- **Yes, but:** The stats group footwear with apparel and textiles . To our knowledge, no footwear shipments have been detained as being produced in or containing materials or components from Xinjiang. That could still change, with the the first-ever addition of a [footwear factory](#) to the UFLPA Entity List in June 2024. This is the only footwear factory on the list.

Country breakdown: The most shipments detained in fiscal year 2025 originate in China, with 250 shipments totaling \$1.29 million in value.

- The next three other countries, by value: The Philippines (17 shipments, \$.88 million in value), Bangladesh (26 shipments, \$.75 million in value), and Nicaragua (8 shipments, \$.65 million in value).

Go deeper: [View the UFLPA stats](#)

Recent classification decisions:
flocking?

NY N349114 (June 11, 2025)

- **Footwear:** Children’s boot, with rubber/plastic (R/P) upper and outsole. The outsole has flocked leather material covering 51% of the of the sole.
- **Takeaway:** The flocking is deemed to completely obscure the material underneath and is considered the material of the sole. This places classification in 6405.90.90. (12.5%)(4B). [Read more.](#)

NY N348117 (May 7, 2025)

- **Footwear:** Men’s waterproof boot. The external surface area of the upper (ESAU) is comprised primarily of R/P with textile gores on the lateral and medial sides. The R/P sole has a thick application of leather flocking, covering most of the outer sole that contacts the ground.
- **Takeaway:** The sole is considered to be other than R/P. CBP fixed classification in 6405.20.90 (12.5%)(4B). [Read more.](#)

Recent CBP decisions on origin

N348196 (May 23, 2025)

- **Issue:** The country of origin for certain leather sneakers completed in Portugal. The unformed leather uppers are shipped to Portugal. There, the uppers are lasted and incorporated into outsole units of either Chinese or Portuguese origin.
- **Takeaway:** As the ruling describes, unformed uppers are considered to have undergone a substantial transformation when they have been shaped by lasting, molding or otherwise, and having closed bottoms. The unformed, unshaped uppers of Chinese origin are lasted to take on the shape of the foot and become “formed” uppers in Portugal. As a result, CBP concluded that the country of origin is Portugal. [Read more.](#)

NY N348343 (May 23, 2025)

- **Issue:** The country of origin for footwear manufactured in Vietnam using materials from China.
- **Takeaway:** The footwear will be manufactured using open-bottom “unformed” uppers, insoles, foam, and label sourced from China. In Vietnam, the upper will be sewed to the insole. The upper will then be sewn to the insole foam and to the outer sole of Chinese or Vietnamese origin. CBP determined that Vietnam is the country of origin. [Read more.](#)

The FDRA Customs Report is a newsletter of customs, administrative, and other developments affecting importers of footwear prepared as a service for FDRA members. Matters reported on or summarized herein may not be construed as legal advice on specific situations.

Thanks for reading this month’s FDRA Customs Report. Feel free to share this newsletter with others on your team. Have a great rest of the week!

Thomas

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