

Customs Report

By Thomas Crockett • Feb 24, 2026

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A few quick updates on forced labor statistics changes and recent footwear classification decisions.

CBP changes UFLPA stats



U.S. Customs & Border Protection (CBP) recently announced major changes to how it provides Uyghur Forced Labor Prevention Act (UFLPA) statistics to the public. Two big changes:

 **HTS breakdown:** The stats previously grouped footwear with apparel and textiles. CBP will now break the information down at the 4-digit Harmonized Tariff Schedule (HTS) level.

- **Take note:** The new stats indicate a small number of 🇨🇳 footwear detentions since the law took effect in June 2022. Based on prior conversations with CBP, we were not aware of any footwear detentions.
- We will provide a deeper analysis of the footwear trends in next month's report.

 **Definition of shipment:** CBP changed the definition of "shipment" ... which dramatically raised the agency's UFLPA enforcement numbers.

- **Tell me more:** "Shipment" no longer means entry; it means a *specific product* being imported in an entry. According to CBP, "a shipment is now defined as an individual import transaction, typically representing a specific product or item being imported. With this change, in the example above where the previous count was one shipment, it is now counted as three shipments (e.g. cotton t-shirt, cotton dress, and cotton pants are now subjected to UFLPA enforcement actions)."

Go deeper: Read more on the changes and access the new UFLPA Dashboard [here](#).

Recent classification decisions



 **NY N357157** (January 15, 2026)

- **Footwear:** Slip-on shoe. Closed toe/heel, below-the-ankle, with outer soles of rubber/plastic (R/P), valued over \$12/pair. The upper is made up of two elastic straps, crisscrossed at the instep. The straps are primarily textile.
-  **One more thing:** The shoe has a foxing-like band.
- **Takeaway:** CBP fixed classification in 6404.19.90 (9%)(4A). This is one of the situations where the presence of a foxing-like band results in a favorable classification. [Read more](#).

 **NY N356865** (December 31, 2025)

- **Footwear:** women's closed toe, open back, mule style shoe with an open heel. The upper and outsole are R/P. Classification is fixed at 6402.99.31 (6%)(4B).
-  **Origin question:** The upper, footbed, midsole, and outsole components are manufactured and assembled in  Italy. The combination is described in the ruling as having the "very essence" of footwear. The combination is shipped to  Spain where the Italy-origin shaft/heel component is joined to the combination assembled in Italy, completing the footwear.
- **Takeaway:** That operation in Spain is considered by CBP to be a minor assembly and does not constitute a substantial transformation. CBP determined that the country of origin is  Italy. [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 weekend!

Thomas

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