

DRAFT

December 18, 2024

The Honorable Gina Raimondo
Secretary
U.S. Department of Commerce
1401 Constitution Avenue Northwest
Washington, D.C. 20230

Dear Secretary Raimondo:

Thank you for your leadership in strengthening the U.S.-India relationship and for your support of the U.S. footwear industry during your tenure as Secretary of Commerce. We write today to urge you to take immediate action to help resolve a time-sensitive and serious issue impacting U.S. footwear companies in the Indian market. The U.S. footwear industry employs hundreds of thousands of workers across the U.S., and sudden disruptions in global footwear supply chains, including India, directly impact U.S. jobs.

The government of India announced mandatory Quality Control Orders (QCOs) for the footwear industry in 2020, which were implemented on August 1, 2024. These orders require all footwear factories to be inspected and certified by India's Bureau of Indian Standards (BIS) before their products can be sold in India. We are confident that our products meet the highest global quality standards, a stated goal of the QCOs. However, we are currently experiencing significant delays from the BIS in certifying foreign factories, and the program has not been timely implemented. The situation has created tremendous business uncertainty for U.S. companies.

Our companies have worked diligently to comply with the QCOs, but to date, none of our partner factories in Vietnam, Indonesia, and Cambodia have been certified. International sportswear brands collectively manage approximately 2,000 mono-brand stores and 3,000 multi-brand stores in India. Without certification, merchandise will be unable to reach store shelves, and these stores could face closure.

We respectfully request your support to convey this concern to India's Commerce & Industry Minister Piyush Goyal, and request that:

- 1) The Ministry of Commerce & Industry allow companies who have complied with the QCO process to import their footwear products to India in the immediate term, until the BIS can inspect, audit, and certify the requested overseas footwear manufacturing facilities; and

2) BIS finalize the inspection and certification of the footwear factories in Vietnam, Indonesia, and Cambodia at the earliest, as per the QCO regulations.

Thank you for your time and attention. We remain committed to working with your team to resolve this important issue.