

April 11, 2026

Jennifer Thornton
General Counsel
Office of the United States Trade Representative
600 17th Street Northwest
Washington, D.C. 20508

Re: Initiation of Section 301 Investigations of Acts, Policies, and Practices of Various Economies Related to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced with Forced Labor (USTR–2026–0133)

Dear Ms. Thornton:

On behalf of the Footwear Distributors & Retailers of America (FDRA), thank you for the opportunity to provide comments on the Section 301 investigation into 60 economies regarding the imposition and enforcement of a prohibition on the importation of goods produced with forced labor.

FDRA is the footwear industry's trade and business association, representing more than 500 footwear companies and brands across the U.S. This includes the majority of U.S. footwear manufacturers and over 98 percent of the industry. FDRA has served the footwear industry for more than 80 years. Our members include a broad and diverse cross section of the companies that make and sell shoes, from small family-owned businesses to global brands that reach consumers around the world.

International trade supports hundreds of thousands of footwear jobs in communities across the U.S. – good-paying jobs in design, innovation, materials, sourcing, compliance, logistics, warehousing, marketing, and retail. **Added tariffs put these jobs at risk.**

With this investigation, FDRA urges USTR to consider the following points:

- **The U.S. footwear industry maintains a longstanding commitment to ensuring global supply chains remain free from forced labor.** Our member companies work hard to build relationships with factory partners that are reliable and maintain high ethical standards. This includes vendor contracts with explicit terms related to forced labor, frequent meetings with factory partners, and a strong system of regular audits conducted by third-party auditors, unannounced verification visits, and training for factories. Our members continue to explore and adopt new tools and technologies to better track and monitor global supply chains. In addition, FDRA maintains an industry Code of Conduct, adopted by several leading U.S. brands, that implements strict criteria for factories and reiterates our strong commitment to zero tolerance for forced labor, slavery, human trafficking, and child labor. FDRA also serves as a member of the Forced Labor Working Group, an inter-association committee that meets frequently to address best practices and other issues in this area.

MATT PRIEST, President & CEO

- **FDRA encourages USTR not to focus solely on a forced labor import ban when examining the effectiveness of combating forced labor globally.** The U.S. has had in place a forced labor ban for nearly one hundred years. Even as the world’s largest and most influential market, the U.S. has not seen its import ban end forced labor globally. Additional efforts that countries can take to combat this problem include diplomatic engagement with specific countries, entering into bilateral or multilateral trade agreements that address forced labor, providing robust international funding for forced labor prevention, delivering international aide to high-risk countries to improve conditions, strengthening international alliances that share a commitment to fighting forced labor, creating enforcement strategies within their home countries, and maintaining strong government partnerships with trusted importers.
- **Imposing tariffs as a remedy could have the unintended consequence of reducing improvements in developing nations.** U.S. footwear brands sourcing in foreign countries export U.S. values and high standards to those countries. Such investment can improve economic conditions for workers in developing nations and help lift individuals out of poverty. This is a critical tool for the U.S. in the fight against forced labor. Tariffs on goods from emerging footwear sourcing countries can make it difficult for U.S. companies to maintain factories in those countries.
- **Imposing tariffs on footwear harms consumers without any benefit to the United States.** The U.S. government already places high tariffs on footwear, *before any new tariffs are added*. Without accounting for the new tariffs that have been added over the past year, consumer goods have an average tariff rate of 2 percent, but footwear has an average tariff rate of 12 percent. The tariff rates are much higher for children's shoes. Kids shoes often reach rates of 20 percent, 48 percent, and higher *before any new tariffs are added*. In addition, there are very little U.S. footwear exports that might be burdened by any actions covered in this investigation. Less than one percent of footwear is made in the U.S., and even less is exported. In 2025, the U.S. exported just 2,376 pairs of footwear to Indonesia, 1,561 pairs to Cambodia, and 88 pairs to Bangladesh. Increasing this tariff burden, through new added 301 tariffs, will result in higher costs for hardworking American families at a time when they already face tremendous economic uncertainty.

FDRA appreciates the opportunity to provide feedback to USTR as it conducts this Special 301 investigation. As an industry, we are committed to ensuring global supply chains are free of forced labor, and we applaud the administration’s goals of fighting forced labor around the world. At the same time, we believe tariffs on footwear are not the answer to addressing this critical issue and could in fact undermine efforts to strengthen conditions in developing nations.

Sincerely,



Matt Priest
President & CEO