

July 10, 2026

Ambassador Jamieson Greer
United States Trade Representative
Office of the United States Trade Representative
600 17th Street Northwest
Washington, D.C. 20508

Re: Request for Comments on the Scope and Operation of a Mechanism To Promote Reciprocal Managed Trade With China (USTR-2026-0430)

Dear Ambassador Greer:

On behalf of the Footwear Distributors & Retailers of America (FDRA), thank you for the opportunity to provide comments on non-sensitive goods trade between the U.S. and China. Through this process, we urge the administration to focus on providing tariff relief to footwear, especially children's footwear.

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.

USTR should provide relief for footwear under the new mechanism to promote reciprocal trade with China, because footwear is a non-sensitive product.

Tariffs on footwear do not protect U.S. jobs or advance national security interests. Instead, they inflate prices on an essential product every family must purchase year after year. Since shoes are not produced in the United States in meaningful quantities, tariffs do not spur domestic manufacturing or strengthen U.S. competitiveness.

We appreciate President Trump's statement in May 2025, "We're not looking to make sneakers and T-shirts. We want to make military equipment. We want to make big things. We want to make, do the AI thing. I'm not looking to make T-shirts, to be honest. I'm not looking to make socks. We can do that very well in other locations. We are looking to do chips and computers and lots of other things, and tanks and ships." As we stated in a letter to President Trump on May 29, 2025, joined by several associations, "We agree that tariff policy cannot scale up a domestic footwear and apparel industry. We appreciate your acknowledgment of the real-world challenges our industries face. Footwear and apparel manufacturing are both labor- and capital-intensive. Shoemaking requires a large, skilled workforce dedicated to mastering intricate techniques [and] there are very few sourcing locations capable of meeting the scale and cost demands of U.S.

consumers.”¹ In addition, many of the materials to make shoes do not exist in the U.S., and there are now added tariffs on all footwear components and machinery.

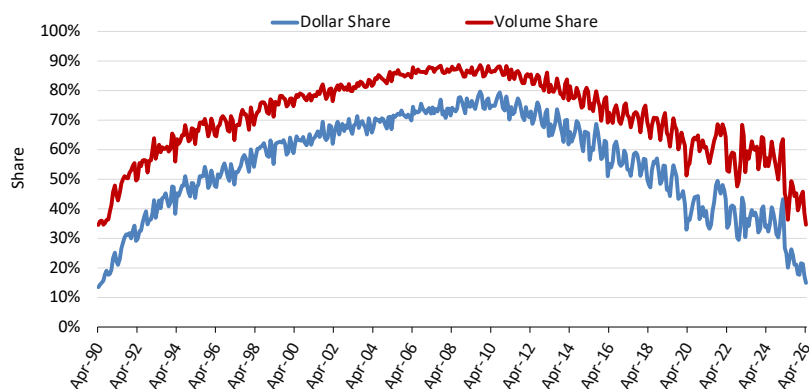
The U.S. should provide relief to footwear products in HTS 6401, 6402, 6403, 6404, and 6405 – and should prioritize children’s footwear within those categories. Providing relief to footwear parts in 6406 would also benefit U.S. footwear manufacturers.

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*. Increasing this tariff burden results in higher costs for hardworking American families at a time when they already face significant economic uncertainty. In fact, retail footwear prices have climbed 5.2 percent over the past year, outpacing overall inflation which came in at 4.2 percent in May. Men’s footwear prices jumped 5.4 percent, the largest increase in 54 months, while women’s footwear prices rose 6.2 percent, the largest increase in 45 months. Children’s footwear prices increased 2.3 percent. As duty rates on footwear imports average 25.7 percent, the impact is disproportionately higher compared to other imports.

This is a very different trade environment for footwear compared to the past several decades.

Footwear companies have long recognized the need to diversify sourcing and not become too dependent on a single sourcing country. It also takes years to shift production. In 2009, 87 percent of the volume of footwear imported to the U.S. came from China. In 2025, that number was 48 percent. In 2009, China accounted for 76 percent of the total value spent. In 2025, the share had more than halved, to 26 percent. Footwear sourcing from China has now declined to volumes that have not been seen since the early 1990s.

Smaller Slices of the Pie: China’s Shares of US Footwear Imports Shrink to Lowest in Decades



Source: USITC

FDRA
FOOTWEAR DISTRIBUTORS
& RETAILERS OF AMERICA

¹ <https://fdra.org/wp-content/uploads/2025/05/Association-Letter-to-POTUS-5.29.25-1.pdf>

Footwear is viewed as a sunset industry in China, as China continues to focus on high-value advanced manufacturing sectors. China did not include footwear in its original Made in China 2025 Strategy, and FDRA companies have witnessed a significant shift of footwear factories from the coastal regions of China to areas further inland. Chinese factories along the coast are increasingly focusing their production on higher value products. U.S. footwear companies have seen increased costs, worker turnover, and prevalent labor shortages in the footwear sector over the past decade – economic indicators that the Chinese government does not consider footwear production to be a key tenet of its industrial policy.

Today, the companies that are often the most reliant on China are U.S. small businesses, because the scale of Chinese footwear production allows entry for all types of footwear at all price points. Many small and family-owned U.S. footwear businesses source 100 percent of their imports from China.

Potential impact of footwear tariff modifications on U.S. consumers and workers:

- **Benefit to U.S. consumers from the potential tariff modifications:** High tariffs on all footwear categories make it harder for families to stretch their budgets, especially during periods of inflation and economic uncertainty. American consumers would benefit from tariff relief through greater consumer value. The hyper-competitive nature of the mass retail footwear market requires companies to fiercely compete for the business of cost-conscious consumers through competitive pricing. In addition, reducing a costly burden on U.S. footwear businesses would generate savings that could be used to provide consumers with greater innovation, choice, and product styles when it comes to footwear.
- **Harm to U.S. consumers from the potential tariff modifications:** No consumers would be harmed by this potential action, because 99 percent of footwear is imported.
- **Benefit to U.S. workers and producers from the potential tariff modifications:** 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. Reducing tariffs on finished footwear would strengthen these jobs. In addition, reducing tariffs on footwear parts would benefit the few remaining U.S. footwear manufacturers that rely on inputs from abroad, including China, to make footwear in the U.S.

FDRA appreciates the opportunity to provide feedback to USTR on reducing tariffs on non-sensitive products like footwear. We stand ready to work with you on this important issue.

Sincerely,



Matt Priest
President & CEO