



UNITED STATES  
FASHION INDUSTRY ASSOCIATION

**June 30, 2017**

Mr. Ed Gresser  
Chair of the Trade Policy Staff Committee  
Office of the United States Trade Representative  
600 17<sup>th</sup> Street, NW  
Washington, DC 20508

Ref: USTR-2017-0008-0001 - Request for Comments: Public Hearing Concerning Out-of-Cycle Review of Rwanda, Tanzania, and Uganda Eligibility for Benefits under the African Growth and Opportunity Act (AGOA)

Dear Mr. Gresser:

On behalf of the joint associations representing apparel brands and retailers, we are writing to offer pre-hearing comments regarding the review of AGOA eligibility for Rwanda, Tanzania, and Uganda.

It is our recommendation that this out of cycle review NOT lead to the suspension or termination of AGOA benefits for these three countries.

The AGOA program was recently renewed for a ten-year period. These countries are now at the beginning stage of undertaking the necessary steps to maximize utilization of the AGOA and to foster sustainable economic growth. Withdrawing benefits now would undermine those initiatives, including those fostering market based economies or leading to the elimination of barriers to U.S. trade and investment. Even the threat of withdrawal induces uncertainty that puts progress toward those reforms in jeopardy.

We acknowledge the concerns that have been raised by the Secondary Materials and Recycled Textiles (SMART) organization. We believe the issues can be resolved without terminating benefits for the named countries.

It is indeed disconcerting when countries – either AGOA beneficiary countries or others – are contemplating policies that would restrict trade through high tariffs or bans. It is our strong hope that the United States and the three countries that are subject to this Out of Cycle review can work together so that this issue can be quickly resolved.

Sincerely,

American Apparel & Footwear Association  
National Retail Federation  
Retail Industry Leaders Association  
U.S. Fashion Industry Association