



#### Testimony of Kimberly Glas, President & CEO National Council of Textile Organizations

# House Ways and Means Trade Subcommittee Hearing on Manufacturing, and Critical Supply Chains: Lessons from COVID-19

July 23, 2020

Chairman Blumenauer and Ranking Member Buchanan, thank you for the opportunity to testify on this subject that is so important to our nation and to the U.S. textile industry and our workers.

My name is Kimberly Glas, and I am President and CEO of the National Council of Textile Organizations. NCTO represents the full spectrum of the U.S. textile sector, from fiber through finished sewn products, as well as suppliers of machinery, chemicals, and other products and services with a stake in the prosperity of our industry. U.S. textile and apparel manufacturers produced \$76 billion in output in 2019, and our sector's supply chain employs more than 585,000 workers from fiber to finished sewn products.

# Textile Industry Response to COVID-19

As our country faced devastating challenges in responding to COVID-19, the U.S. textile industry has stepped forward and answered America's call during this time of crisis. Our industry received urgent requests, from the highest levels of government to nurses and doctors on the front lines, asking for immediate assistance. Our industry is honored to help during this critical time and feel it is our duty to contribute to the health and safety of our nation.

NCTO members have been at the forefront of efforts to deploy manufacturing resources to address the critical need for personal protective equipment (PPE) and other medical and sanitation supplies. Our member companies quickly mobilized to find innovative solutions to the crisis, proactively retooling production lines and retraining workers to provide U.S.-made PPE to front-line medical workers.

These American companies often put aside competitive differences to construct multi-company PPE supply chains virtually overnight. In doing so, they were able to manufacture and supply hundreds of millions of urgently needed items including face masks, gowns, and their textile components at a time when global supply failed to meet the needs this crisis has required.

While domestic textile manufacturers have undertaken heroic efforts to confront the ongoing crisis, the onshoring of a permanent PPE industry will only materialize if proper government policies and other actions are put in place to help domestic manufacturers survive the current economic crisis and to incentivize the long-term investment needed to fully bring PPE production back to the United States.

# Current State of the Industry

While domestic textile manufacturers remain a fully committed partner in the government's efforts to battle the pandemic and supply essential PPE, the severity of the current economic crisis facing our member companies cannot be overstated. Despite all their PPE production efforts, the vast majority of

U.S. textile companies are now confronted with idle capacity, the rampant cancellation of orders, plant closures and workers being furloughed. Regrettably, existing conditions are so severe that century-old textile companies that survived the Great Depression, the onslaught of imports over the past 40 years, and the recent Great Recession are now facing the reality of bankruptcy and extinction.

COVID-19 is creating unprecedented demand destruction for apparel and textiles. Billions of dollars of orders for fiber, yarn, and fabric have been cancelled as retail customers close or operate at reduced capacity. The collapse in demand is evident in recent U.S. Census Bureau data showing clothing sales for May fell by more than 62 percent relative to February. This comes after March fell by 49 percent, and April fell by 86 percent. The cumulative decline in March, April, and May alone represents \$44 billion in lost sales. In fact, clothing sales exhibited the largest percentage decline of all major spending categories within the U.S. economy over this time period.<sup>1</sup>

This historic downturn in demand has led to the majority of U.S. textile manufacturers operating at barely 10-20 percent of existing capacity since March of this year. These grim statistics lead to the conclusion that U.S. textile manufacturers are suffering as much as any single segment of the U.S. economy because of the current crisis. Noting that our ability to make PPE long term in the United States depends on the health of a strong domestic textile industry, we must use all the tools necessary to ensure this manufacturing sector and other key sectors survive and thrive long after this crisis is over. We need a robust manufacturing stimulus package for the industry and its workforce.

## COVID-19: Lessons Learned

If the current pandemic has taught us anything, it is that onshoring PPE production is not just a health care issue; it is a national security issue. We must examine the true cost of not protecting the American people and our heroic medical workers on the front lines. This is a cost too high for any of us to pay. There is great apprehension within the textile industry that the PPE supply chains our industry created overnight will evaporate just as quickly if federal and state governments do not immediately begin to approve and implement the right policies and tools.

The loss of 57,000 manufacturing firms between 2001-2010 contributed to the shortage of basic goods needed to combat this deadly pandemic.<sup>2</sup> The offshoring of domestic manufacturing coupled with the United States' overreliance on global supply chains dominated by China exposed the fragility of our own ability to respond to an international health crisis that paralyzed our economy and put frontline workers in harm's way.

Health care workers are continuing to sound the alarm over inadequate PPE protections, even several months after vast PPE shortages first made the headlines. We have a significant challenge and opportunity before us to ensure this does not happen again.

#### How Did We Get Here?

<sup>&</sup>lt;sup>1</sup> U.S. Census Bureau, Monthly Retail Trade Report, Seasonally Adjusted Monthly Sales for 448: Clothing and Clothing Accessories Stores

<sup>&</sup>lt;sup>2</sup> <u>https://www.industryweek.com/the-economy/trade/articl333 e/22024695/how-trade-policies-led-to-the-decline-of-american-manufacturing</u>

Before we can fully appreciate the need for new policies intended to avoid such a catastrophic outcome in the future, it is important to review the circumstances that resulted in the U.S. becoming completely dependent on foreign sources for PPE - primarily from China - at the onset of the pandemic.

U.S. textile manufacturers compete in one of the most unbalanced economic playing fields of any industrial manufacturing segment. NCTO has long called for a review of U.S. trade policy and the negative ramifications for the U.S. industrial base that stem from the aggressive, predatory practices of many of our foreign competitors and the lack of reciprocal market access for our products abroad.

The United States is the largest single-country importer of textile and apparel products overall as well as of PPE specifically. In 2019, the U.S. imported nearly \$125 billion of textiles and apparel – a record high – and ran a trade deficit of \$102 billion.<sup>3</sup> Furthermore, textiles and apparel ranks third, behind only electronics and transportation equipment, in terms of annual contribution to the U.S. trade deficit.<sup>4</sup> Notably, all of the top five contributors to the U.S. trade deficit are low-cost Asian producers, with China alone accounting for almost half of the deficit in our sector.

Top 5 Contributors to U.S. Trade Deficit in Textile & Apparel (Billion \$) (2019)		
Country	Trade Balance	% of Total
China	-\$42.3	42%
Vietnam	-\$14.6	14%
India	-\$8.6	8%
Bangladesh	-\$6.2	6%
Indonesia	-\$4.7	5%
World	-\$102.0	

Source: U.S. Dept. of Commerce, Office of Textiles and Apparel, Trade Balance Report

The situation regarding PPE trade tracks along the same trends. According to a recent WTO report, the United States was the top importer of "personal protective products" last year at over \$19 billion, followed by Germany at \$11 billon. The WTO report also demonstrated that the largest exporter of PPE by far was China at \$25 billion last year.<sup>5</sup>

A confluence of major economic developments and various U.S. policy initiatives drove the massive expansion of foreign penetration into the U.S. textile and apparel market that began in the late 1990s and extended through the 2008 recession and beyond. From a macroeconomic standpoint, the Asian financial crisis of the late 1990s caused massive currency devaluations on the part of virtually all of our major Asian competitors, which cut their prices for textile and apparel exports by 30-80 percent virtually overnight. This was followed by an onslaught of exports from state-owned factories in China and a practice of persistent currency undervaluation by the Chinese government. These adverse macroeconomic factors were compounded by a series of U.S. policy decisions greatly exacerbated the contraction of U.S. textile and apparel manufacturing.

<sup>&</sup>lt;sup>3</sup> OTEXA Trade Balance Report

<sup>&</sup>lt;sup>4</sup> U.S. International Trade Commission, U.S. Trade by Industry Sector and Selected Trading Partners for 2018, <u>https://www.usitc.gov/research\_and\_analysis/tradeshifts/2018/us\_trade\_by\_industry.pdf</u>

<sup>&</sup>lt;sup>5</sup> World Trade Organization, Trade in Medical Goods in the Context of Tackling COVID-19, Accessed at <u>https://www.wto.org/english/news\_e/news20\_e/rese\_03apr20\_e.pdf</u>

These trade policies included:

- January 1995 Multi-Fiber Arrangement Textile Quota phase-outs begin
- December 2001 China joins the WTO
- December 2001 Vietnam is granted temporary normal trade relations status with the U.S.
- January 2005 Textile Quota phase-outs completed
- January 2007 Congress approves Permanent Normal Trade Relations (PNTR) for Vietnam

The impact of these macroeconomic and policy factors on the U.S. textile industry in the 1997-2009 timeframe was severe. Over this period, U.S. textile and apparel production declined by 61 percent, employment decreased by a staggering 69 percent, exports fell by 15 percent, and the trade deficit in these products increased by 82 percent. This devastating downturn took place even as U.S. consumption of textile and apparel goods was expanding, with the U.S. population growing by nearly 12 percent and GDP up by almost 30 percent over the same time span.<sup>6</sup>

Following this period of precipitous declines, the industry has stabilized and in fact made a significant recovery. Since 2009, domestic textile and apparel output has increased by 11 percent to a total of \$76 billion last year.<sup>7</sup> Textile and apparel exports have steadily increased, with 2019 registering a near record year at \$29 billion.<sup>8</sup> The recovery is due to the industry's strong focus on product innovation, its adoption of highly technical manufacturing processes, and its commitment to remaining the global leader in product quality. However, due to the extreme predatory trade practices that plague our industry sector, the U.S. trade deficit for textiles and apparel continues to expand, as demonstrated by the chart below.



Source: U.S. Dept. of Commerce, Office of Textiles and Apparel, Trade Balance Report

<sup>&</sup>lt;sup>6</sup> <u>http://www.ncto.org/wp-content/uploads/2017/05/2017-05-10-Joint-Textile-Association-Trade-Deficit-Submission.pdf</u>

<sup>&</sup>lt;sup>7</sup> U.S. Census Bureau, Manufacturers' Shipments, Inventories, and Orders (M3) Survey, and Annual Survey of Manufacturers (ASM), value of shipments for NAICS 313, 314, 315 & 32522. 2016 data used to estimate 2019 NAICS 32522 figure.

<sup>&</sup>lt;sup>8</sup> U.S. Department of Commerce and U.S. International Trade Commission (Product grouping includes Fiber, Yarn, Fabric, Apparel and Other Sewn Products.)

The significant spike in the trade deficit—a 39 percent increase since 2009—indicates the U.S. industry continues to be undermined by our competitors in the global textile and apparel supply chain, namely Asian countries that often grant limited access to their own markets and continue to use every unfair advantage available to them to grab market share at the expense of U.S. manufacturing jobs. These countries use a wide range of unfair trade schemes, including, but not limited to: exploitative labor practices, government-subsidized production, state-owned enterprises, currency manipulation, intellectual property theft and lax or non-existent environmental standards.

Moreover, China holds the dubious distinction of being the world's leading purveyor of illegal trade practices that are designed to unfairly bolster a blatantly export-oriented economy. These predatory practices take many forms, from macroeconomic policies that grant across-the-board advantages to their manufacturers, to industry specific programs intended to dominate global markets in targeted areas. The U.S. textile industry has been a longstanding victim of China's predatory export practices.

Further, we cannot talk about the current PPE crisis without talking about China as the dominant global player in this sector. As noted by the Peterson Institute for International Economics, China had already claimed the dominant share of PPE production before the pandemic began - exporting more surgical masks, medical goggles, and protective garments than the rest of the world combined.<sup>9</sup> And they have ramped up production substantially since. The Vice Minister of Foreign Affairs in China, Ma Zhaoxu, said that from March to May 2020 China exported 70.6 billion masks. For context, the entire world produced about 20 billion for all of last year. Further, according to a Congressional Research Service April 6 report "COVID-19: China Medical Supply Chains and Broader Trade Issues," in February 2020 China had ramped up face mask production—both basic surgical masks and N95 masks—from a baseline of 20 million a day to over 100 million a day while also ordering that "its bureaucracy, local government and industry secure critical technology medical supplies and medical-related raw material inputs from the global market."<sup>10</sup> In addition, China placed export controls on certain key products that exacerbated the global shortage of PPE. As export controls have been eased, there has been a segregation between the developed and developing world on who can afford to secure this life-saving PPE.

The predatory trade practices of China in this and other sectors cannot be understated. Their "Made in China 2025" industrial policies were designed to nationalize and corner market share for these products, and these sectors have been bolstered further by massive government subsidies. The insatiable appetite globally for cheap products has been further exploited by fly-by-night middlemen and "wild west" purchasing that has led to the explosion of the sale of counterfeit product and price gouging in the marketplace.

Since February, Chinese production of these materials has increased exponentially – with all signs pointing to a hyper-charged Chinese dominance in the PPE sector for many decades to come. Chinese officials noted on March 6<sup>th</sup>: "Taking protective clothing as an example, our daily output has reached less than 20,000 pieces from the initial stage of the epidemic, reaching the current 500,000 pieces. N95 masks have gone from 200,000 to 1.6 million, and ordinary masks have reached 100 million."<sup>11</sup>

<sup>&</sup>lt;sup>9</sup> <u>https://www.piie.com/blogs/trade-and-investment-policy-watch/china-should-export-more-medical-gear-battle-covid-19</u>

<sup>&</sup>lt;sup>10</sup> <u>https://crsreports.congress.gov/product/pdf/R/R46304</u>

<sup>&</sup>lt;sup>11</sup> <u>http://www.gov.cn/xinwen/2020-03/06/content 5488021.htm</u>

Unless policy solutions are advanced now, it is clear that China will cement and expand its global dominance in the marketplace for these products in the decades to come.

### **Proposed Solutions**

Outlined below is a series of concrete steps to address both our long-term goals of building, strengthening, and maintaining a U.S. PPE supply chain, and meeting the immediate PPE needs of our frontline health care workers, patients, and the general public. In addition, we also suggest a reassessment of aspects of our national trade policy to reverse the policy environment that over the past 40 years substantially downsized our domestic manufacturing base and created a catastrophic dependence on China and others for essential materials at the onset of COVID-19.

#### Long-Term Solutions

Earlier this week, NCTO was proud to lead a joint statement from 21 associations and groups representing the entire supply chain of the domestic PPE manufacturing industry. This statement was signed by groups representing our nation's fiber producers; yarn, fabric, and metal producers; cut-and-sew operators; American workers; and others.<sup>12</sup> We are united in our support for five main principles that are essential for effectively reshoring and safeguarding domestic PPE manufacturing.

**Berry Amendment for PPE:** First, we must create strong domestic procurement rules for federal PPE purchases substantially similar to the Berry Amendment and the Kissell Amendment.

Our military leadership recognizes the importance of having a U.S. manufacturing base capable of servicing its mission critical needs. Otherwise, our national defense would be severely hampered in times of conflict by disrupted international supply chains and our military effectiveness beholden to the whims of potentially hostile regimes who control production through state-owned businesses.

The Berry Amendment, a domestic procurement law which ensures that we have the industry capable of servicing our men and women in uniform, is the model America needs to follow to safeguard our public health. Our taxpayer dollars should not go to China and other offshore PPE producers, only to have those same producers withhold access to vital supplies and equipment in the face of global shortages. In fact, applying these strong procurement rules across our government purchases of PPE will unequivocally lead to investments in this sector and help onshore this industry.

As with defense procurement, new federal government domestic purchasing requirements for PPE will create the stable demand for U.S.-made PPE that will incentivize investment in and the viability of domestic PPE manufacturing. While tax incentives for manufacturing are also helpful, they will not be sufficient alone to create and support the capital investment required in this sector.

**Fixes for the Strategic National Stockpile:** Next, we need to improve and streamline the role that the Strategic National Stockpile plays in preparing for and leading our national response to a national health crisis.

<sup>&</sup>lt;sup>12</sup> Joint Statement on Policy Objectives for Reshoring and Safeguarding Domestic PPE Manufacturing, <u>http://www.ncto.org/wp-content/uploads/2020/07/2020-07-20-Joint-Industry-Statement-on-PPE-Principles-</u> <u>Final.pdf</u>

The Stockpile must always be prepared to meet our public health needs efficiently and adequately during a pandemic or other public health emergencies. We must have well-stocked, current supplies on hand, sufficiently capable means for distributing these supplies, and the ability to quickly mobilize production to supplement supplies as needed.

This will require additional advance planning by the executive branch and proper oversight and funding by Congress. It will also require critical domestic supply chain mapping to identify gaps in the U.S. PPE supply chain and develop recommendations to meet existing and future supply chain needs.

**Incentivize private sector purchases of U.S.-made PPE:** Next, while federal purchases certainly support domestic production and U.S. manufacturing, the marketplace for American-made PPE should be as broad as possible to build and sustain our capacity. For instance, while the Berry Amendment is instrumental in supporting American textile manufacturing, defense orders on average account for only a fraction of our manufacturers' total production. Private sector demand drives domestic production.

Expanding our domestic customer base for PPE beyond the federal government to the private sector will provide long-term stability to U.S. PPE producers and enhance our national manufacturing capacity. Once this current pandemic subsides, our private sector has every incentive to chase the cheapest price for Chinese PPE. Without federal incentives for purchasing domestic PPE, our hospitals and communities will face the same PPE shortages when the next public health emergency arrives.

**Provide funding assistance for companies to reconstitute domestic PPE supply chains:** Next, as I've previously outlined, earlier this year many American textile companies moved swiftly to recalibrate their production in order to build supply chains for PPE and other vital medical supplies. These actions were undertaken at their own expense and without guaranteed purchase orders.

The federal government should provide grants to these and other U.S. companies that took the initiative to repurpose their factories and purchase equipment as part of our national pandemic response. Further production grants and tax credits will support future investments in domestic PPE production.

**Strengthen the Berry Amendment:** Finally, Congress needs to take steps to correct the gradual erosion of domestic procurement requirements under the Berry Amendment in recent years. This includes permanently re-setting the Berry contracting threshold to \$150,000 and eliminating loopholes for foreign-made products.

## Short-Term Solutions for the Current Contracting Process

In the near term, there are several actions Congress can take that would be strong steps to support our PPE manufacturing capacity.

I have been heavily, almost singularly, engaged for the last few months with our federal government working to meet the nation's PPE needs. Recently, contracting responsibility was transferred from HHS and FEMA over to the Defense Department's Defense Logistics Agency-Troop Support, or DLA.

DLA contracts for PPE are covered by the Berry Amendment's domestic sourcing requirements. However, DLA made the determination in April that our current domestic capacity could not meet HHS's overwhelming demand for masks, gowns, and other items. As a result, DLA issued a "domestic nonavailability determination waiver," or DNAD, giving the agency flexibility to use foreign sources to fill PPE contracts.

As an industry, we are concerned with any precedent being established to waive the Berry Amendment for the long term for these products, which will dissuade any investment in the United States. Noting this unique contracting environment, there are several steps Congress can insist that DLA follow to maximize and support our current production capacity as it solicits bids and enters into contracts for PPE.

**Prioritize existing U.S. and regional capacity:** DLA has signaled that it intends to solicit bids for PPE under the DNAD from foreign manufacturers as well as domestic sources capable of filling Berry-compliant orders. For all future PPE purchases by the federal government, we strongly encourage the government to uphold the Berry Amendment. After purchases of Berry Amendment compliant goods are exhausted, then the government should issue a DNAD to purchase non-USA made products. Since a DNAD is already in place for gowns and surgical masks, we fear that the entire available U.S. capacity for production as applied by the Berry Amendment will not be fully utilized in this process. We need DLA to first accept as many Berry-compliant bids as feasible before entertaining bids for foreign-made PPE, and we are urging DOD/DLA to do this in their review process as they make awards.

After Berry sources are exhausted, we feel that priority should next be given to bids that utilize the joint production capacity of U.S. producers and our Western Hemisphere FTA and preference partners over Chinese and other foreign-made product. We are concerned with the precedent to waive Berry for future purchases because it will dissuade potential investment.

**Issue long-term contracts:** Currently, while operating under the DNAD, it is our understanding that DLA intends to issue only short-term contracts covering a period of a few months. These terms do not provide the certainty that domestic industry needs to make the investments in our facilities and workforce to meet long-term PPE manufacturing goals. Our industry wants to make significant investments in automated equipment to make PPE, but they need long-term 5-year contracts to help realize that investment. This contract certainty would provide added assurances and incentivize investment in equipment, hiring workers, and retooling operations. The Defense Production Act (DPA) can be utilized as an important vehicle to issue long-term contracts to help drive further critical investment in this sector and re-establish supply chains.

**De-emphasize price as a factor:** U.S. companies do not operate on a level playing field and cannot compete with China's heavily government subsidized PPE supply chain and its undervalued labor—which is inescapably linked to human rights abuses, including to the country's Uighur Muslim population. In fact, over the weekend *The New York Times* released an investigative video highlighting the production of PPE in Uighur camps with forced labor.<sup>13</sup> When price is the only or major deciding factor in awarding contracts, China will win every time by doubling down on exploitive labor and predatory trade practices.

**Strategically deploy the Defense Production Act:** Since its inception, DPA has been utilized by the Defense Department to make critical investments in domestic textile manufacturing infrastructure and capacity. The American textile industry welcomes the private-public partnerships that are created when the federal government makes capital investments under DPA and guarantees purchases through long-

<sup>&</sup>lt;sup>13</sup> "Wearing a Mask? It May Come From China's Controversial Labor Program." *New York Times*, July 19, 2020, <u>https://nyti.ms/2Zlo2pr</u>

term contracts. The U.S. industry is proud to be called upon to shift production in a time of national need, whether to support our national defense or public health.

#### **Other Solutions**

At this time where the results of our national approach to international trade is in sharp relief, it is critical that Congress further examine decades of detrimental trade policy that has benefited foreign imports at the direct expense of our American manufacturers and workers and severely damaged our manufacturing capacity. This recalibration of trade policy should include the following:

**Support tariffs:** Tariffs serve critically important roles in balancing the unfair advantages that nonmarket economies have over domestic producers. These advantages include government subsidies, state-owned enterprises, non-reciprocal trade policies, intellectual property theft, currency manipulation, and sub-standard labor and environmental policies. Congress needs to keep tariffs in place to support U.S. businesses and workers and our FTA partners who abide by higher standards to earn duty-free access to our market. We appreciate the committee's work in this regard. Congress must resist pressure to waive, delay or reduce duties from massive importers like Amazon and Walmart who undermine U.S. manufacturing through an insistence on sourcing goods from countries that routinely employ these sub-standard practices.

Congress should also revisit significantly consequential tariff policies like the current U.S. de minimis level of \$800 that hurt the manufacturing sector. Every day, the largest retail distributors in the world use Section 321 de minimis tariff waivers to import millions of individual shipments into the U.S duty free. This tariff structure loophole has allowed for counterfeit and unsafe products, including PPE, to enter the United States duty-free with minimal inspection from any country in the world. Section 321 waivers are exploding, forcing U.S. manufacturers and brick and mortar retailers to compete with tariff-free imports simply because of the manner in which an imported product is transacted. Further, China is by far the largest beneficiary of our exorbitant de minimis level, which grants them duty-free treatment with none of the obligations our FTA partners have accepted for that same access.

**Closely examine future FTA partners:** Duty-free access to the U.S. consumer market is one of our nation's greatest tools used to secure international reforms, and to support our democratic allies. We must take care that we do not devalue this leverage by entering into FTAs with non-market economies like China and Vietnam, unless and until they undertake the serious, permanent market and democratic reforms we expect of our international allies. The U.S. should also be hesitant to adopt new preferences programs that undermine existing, valuable partnerships in the Western Hemisphere.

**Reject any expansion of GSP for textiles and apparel:** The U.S. textile industry and many or our free trade agreement and trade preference partners oppose efforts by brands and retailers to expand GSP for textile and apparel products. Any expansion efforts would severely undermine our trade agreements and, in addition, would incentivize the offshoring of PPE production to low wage countries. In fact, any expansion for this trade sensitive sector would be severely destructive to U.S. manufacturing. We urge Congress to continue to reject these expansion proposals that would undermine onshoring PPE.

**Renew the Caribbean Basin Trade Partnership Act:** Since its inception in 2000, CBTPA has become an important element of the effort to develop and facilitate trade within the Caribbean Basin region, most notably with Haiti. Overall, CBTPA is structured in a fashion that reasonably balances the interest of U.S. textile manufacturers with those of textile and apparel manufacturers in the region. NCTO supports a seamless extension of CBTPA beyond its current expiration date of September 30, 2020 without any changes to its textile and apparel provisions. NCTO's support of CBTPA renewal is a function of our overall backing of trade policies that strengthen the Western Hemisphere production chain.

**Reform the Miscellaneous Tariff Bill:** American textile manufacturers strongly support the MTB. Traditionally this bipartisan bill has been instrumental in making U.S. manufacturers more competitive against foreign imports by cutting our costs on vital manufacturing inputs and components not made domestically.

However, as currently structured, the MTB has become a tariff giveaway for foreign-made finished goods that go directly to retail, with zero U.S. manufacturing, processing, or other value-add of any kind. In both iterations of the MTB since 2016, nearly half of all petitions for duty-free preferences were for goods that where fully finished products, wholly manufactured abroad. And for textiles, apparel, footwear and travel goods collectively, more than 75% of petitions were for end items. This approach to trade policy undermines domestic manufacturing and American workers, disincentivizes investment in U.S. production, and rewards those who would offshore whole production chains rather than invest in making goods here or with one of our FTA partners.

**Enforce Our Trade Laws**: The full force of our country's investigative and enforcement capabilities must be unleashed to eradicate illegal and unfair trading practices. This would include steps to severely punish dumping and subsidy activities, and to block the importation of counterfeit goods and those made with slave labor and child labor.

#### Conclusion

In closing, the time is ripe for a revival of American PPE textile manufacturing. It has already begun, but we are at a pivotal point. Without the necessary policy response and support, our recent progress will be undone just as quickly, and the China stranglehold over global medical textile supply will be locked in for the foreseeable future with no reason to invest here. However, with the right policy framework, the domestic PPE supply chains built overnight can endure and grow, creating a level of self-sufficiency domestically that we have learned the hard way is essential to our national health and economic security.

The U.S. textile and apparel industry is ready, willing, and able to supply our country's PPE needs now and for what lies ahead. Help our industry help our country at this critical juncture.