## OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE GSP SUBCOMMITTEE

## 2015 GSP Annual Review:

Request for addition of the following as eligible products HTSUS Subheadings
At the 8-digit level:
4202.11.00, 4202.12.20, 4202.12.40,
4202.12.80, 4202.21.60, 4202.21.90,
4202.22.15, 4202.22.45, 4202.22.80,
4202.31.60, $4202.32 .40,4202.32 .80$,
4202.32.95, 4202.91.00, 4202.92.15,
$\underline{4202.92 .20}, \underline{4202.92 .30}, \underline{4202.92 .45}$,
4202.92.90, 4202.99.90

At the 10-digit level:
4202.11.0030, 4202.11.0090,
4202.12.2020, 4202.12.2050,
4202.12.4000, 4202.12.8030,
4202.12.8070, 4202.21.6000,
4202.21.9000, 4202.22.1500,
4202.22.4500, 4202.22 .8050 ,
$4202.31 .6000,4202.32 .4000$,
$4202.32 .8000,4202.32 .9550$,
4202.32.9560, 4202.91 .0030 ,
4202.91.0090, 4202.92.1500,
4202.92.2000, 4202.92.3020,
4202.92.3031, 4202.92.3091,
4202.92.4500, 4202.92 .9026 ,
4202.92.9060, $\underline{4202.99 .9000}$

## PETITION OF THE GOVERNMENT OF THE PHILIPPINES

Ron Sorini
Sorini, Samet \& Associates LLC
$70013^{\text {th }}$ Street, NW, Suite 930
Washington, DC 20005
TEL (202) 393-4481
FAX (202) 303-4494
rsorini@ssa-dc.com
Trade Advisers to the Philippines

John Kingery
Kingery, Samet \& Sorini PLLC
$70013^{\text {th }}$ Street, NW, Suite 930
Washington, DC 20005
TEL (202) 393-4481
FAX (202) 393-4494
jkingery@ssa-dc.com
Attorneys to the Philippines

On behalf of the Government of the Philippines
Dated: October 16, 2015

## I. INTRODUCTION

The Government of the Republic of the Philippines is grateful that the U.S. Congress passed the Trade Preferences Extension Act of 2015, which was signed into law by President Obama on June 29, 2015, which among other things, reauthorized the U.S. Generalized System of Preferences (GSP) and extended this important program to travel goods. Pursuant to that law, the Philippine Government ("petitioner") respectfully requests that the products identified on the cover page and further described in section III.A be granted the duty-free benefits of GSP for Beneficiary Developing Countries (BDCs). The Philippines is a longstanding member of the GSP program. The travel goods industry, which is growing and expanding exports to the United States and other markets, is important to the economic development of the Philippines.

The Philippine Government believes the granting of duty-free benefits will help secure current employment in the travel goods industry, as well as facilitate the growth of decent jobs. This will help offset declines in the Philippine garment industry that occurred over the last decade. Further, in addition to the benefits to larger companies and investors, we believe that small and medium sized enterprises will be in a position to develop handicraft and artisanal production of goods from local fibers such as the use of banana and other vegetable fibers in products such as handbags and laptop sleeves if this petition is approved.

Philippine producers have developed a small but important share of the U.S. travel goods market; yet the Philippines remains well below current market share of China, ${ }^{1}$ which presently is a dominant supplier. China currently controls 87 percent of the import market share by quantity, while the Philippines supplied 0.5 percent to the U.S. market by quantity (see Appendix B). ${ }^{2}$ The removal of the 4.5 to 20 percent ad valorem tariffs on the covered items would make the Philippines and other BDCs more competitive in the U.S. market. China's current efficiency and the costs associated with shifting production means that, without GSP benefits for travel goods, the Philippines will remain a relatively small supplier of these products. The Philippine Government understands that many companies who either already source some travel goods from Philippine factories, plus others who are actively making plans, are committed to much needed additional investment if these products are provided GSP dutyfree treatment.

The Philippines has a number of advantages that make it a logical producer of travel goods, including a skilled workforce and a government open to trade with the United States. Since China's accession to the WTO, the Philippines lost 500,000 jobs in the apparel sector, most of which migrated to China. That has been devastating to Philippine workers and harmful to the Philippine economy, but these workers are ready to go back on the job if GSP benefits enable a shift of some production of travel goods from China.
U.S. firms also see many positive aspects to operating in the Philippines compared to the current business atmosphere in China, where production of travel goods overwhelmingly takes place at this point. During a state visit to the Philippines in 2014, the U.S. Government dismissed a labor review filed through the

[^0]GSP Committee 2013 annual review. In addition, the Obama administration removed the Philippines from the Special 301 Watch List on April 19, 2014 and was discussed positively in the 2015 Special 301 Report. ${ }^{3}$

The United States also maintains a relatively balanced trade relationship with the Philippines. In 2012, the United States ran a $\$ 1.5$ billion trade deficit. This dropped to $\$ 865$ million in 2013, the year the Philippines was devastated by a super typhoon, and then increased to $\$ 1.7$ billion in 2014. Comparatively, the two largest producers of travel goods had very large trade surpluses with the United States. In 2014, China had a $\$ 343$ billion trade surplus and Vietnam's grew from $\$ 15$ billion in 2012, to $\$ 19$ billion in 2013, to $\$ 24.8$ billion in 2014.

The Philippines is not alone among BDCs in competing with China for U.S. market share in travel goods. Its Association of Southeast Asian Nations (ASEAN) partners, Cambodia, Indonesia and Thailand, are among the other BDC suppliers that hold small but meaningful parts of the U.S. market. It is logical to expect these and other BDCs to become attractive sources for travel goods brands seeking to diversify production from China. The Philippines believes that the small shift in sourcing seen since 2012 away from China will strengthen if GSP duty-free treatment is granted.

The Philippines and other BDCs will also be able to expand current production by leveraging duty-free access to both the U.S. and EU markets. The Philippines currently maintains membership in the European Union's Generalized Scheme of Preferences "GSP Plus" program. Subheading 4202 is considered "sensitive" in the EU Generalized Scheme of Preferences. Unlike the situation in the United States, meaningful production of the covered products continues in the EU. Subheading 4202 also receives benefits under preference programs in Canada, Japan, and Australia. Canada maintains dutyfree imports for Least Developed BDCs (LDBDCs) under its preference programs, which applies to Cambodia. The Philippines also qualifies as a BDC to Canada's GSP program, for which these products receive decreased duties of 5 to 7 percent. Japan also maintains duty-free imports for LDBDCs, for which Cambodia also applies. These items are also duty-free or duty-reduced for Japan's FTA partners, which include Thailand, Indonesia, India, and the Philippines. Australia maintains duty-free imports for Cambodia as a LDBDC, and ASEAN countries have duty-free access to Australia under the AANZFTA. India receives a discounted tariff on 6 HTS subheadings to Australia as well.

Granting this petition would further the economic growth of the Philippines by boosting exports, creating jobs and growing GDP. Should the United States Government approve the petition, the Philippines conservatively estimates that exports will increase by about $\$ 100$ million annually for the first five years after duty-free access is granted. Based on this estimate, the increase in exports would generate 70,000 new direct jobs, which would lead to an increase in GDP of nearly 0.5 percent. ${ }^{4}$

Finally, the U.S.-Philippines relationship is a key pillar of U.S. diplomatic and national security policy in the Asia-Pacific region. The U.S. and the Philippines signed a Trade and Investment Framework Agreement (TIFA) in 1989 and holds regular bilateral discussions on trade. Moreover, the Philippines is a longstanding major non-NATO treaty ally of the United States. During his state visit in 2014, President Obama stressed the need for continued strong economic ties and for the U.S. to work to help

[^1]the Philippines to achieve equitable economic growth for all Filipino citizens. By helping the Philippines grow their share in the travel goods market, the U.S. would help grow employment, skills and investment in the Philippines to meet this goal.

This petition includes detailed cost, sourcing, and price information of the individual companies provided at the request of petitioner, and therefore any public release of such sensitive company business information would cause substantial harm to the individual companies if revealed and also to the economic interests of petitioner. The information has not been shared between companies, but only with petitioner and its advisors and counsel. Thus, petitioner respectfully requests that all sensitive business confidential information designated in brackets - [...] - be treated as such during the interagency review of the petition.

## II. PRODUCT DESCRIPTION.

## A. Description of Products:

This petition 28 Harmonized Tariff Schedule (HTS) 10-digit subheadings covering a variety of products with various uses.

## Luggage

First, hand held "occupational" luggage, such as attaché cases, briefcases, and school satchels used for daily commuting to work or school. These may be of leather (4202.11.0030, 4202.11.0090) or manmade fiber (4202.12.8030), or cotton textiles (4202.12.4000). These goods provide "storage, protection, organization, and portability" to documents, files, and personal effects. ${ }^{5}$

Also covered are trunks, suitcases, and vanity cases used for "storage, protection, organization, and portability" of items, according to descriptions by Customs and Border Protection. ${ }^{6}$ These may include suitcases (with or without wheels) as well as "Pullman" type suitcases with a collapsing handle. Vanity, or makeup, cases also fall into this category. These may be made of plastic (4202.12.2020 and 4202.12.2050) or of manmade fiber (4202.12.8070).

## Handbags

This petition also covers five HTSUS subheadings exclusive to handbags. As described by Customs and Border Protection, a handbag is "designed to contain the small personal effects commonly carried on a daily basis" that could include money, car keys, and small accessories. ${ }^{7}$ Handbags may or may not have a shoulder strap or handles.

[^2]This petition includes leather handbags valued at $\$ 20$ or less (4202.21.6000), leather handbags valued over $\$ 20$ (4202.21.9000), as well as handbags with an outer surface of plastic (4202.22.1500), cotton (4202.22.4500), and man-made fiber (4202.22.8050) regardless of value.

## Pocket Goods

This petition also covers pocket goods, as defined by the Harmonized Tariff Schedule as "articles of a kind normally carried in the pocket or handbag," of a variety of materials. These are small goods used to organize and transport small items and money. These goods include wallets, business card cases, lipstick carry cases, coin purses, coupon holders and eyeglass cases. These items may be made of leather (4202.31.6000), cotton (4202.32.4000), vegetable fibers (4202.32.8000), man-made fibers (4202.32.9550), or textiles (4202.32.9560).

## Backpacks, Sport \& Travel Bags

Eleven HTS subheadings includes a variety of products such as bags commonly purchased by consumers for recreational, commuting, and travel purposes. These include backpacks of man-made fibers, both those commonly seen in use by students and commuters, utilizing two shoulder straps, to more advanced packs with load-bearing internal frames, shoulder straps, and attached weight-bearing belts used for camping or outdoor recreation (4202.92.3020).

In addition, this petition includes "travel, sports and similar bags" of a variety of materials, including cotton, leather, vegetable fibers, man-made fiber, textiles, and plastic sheeting (4202.91.0030, 4202.92.1500, 4202.92.2000, 4202.92.3031, 4202.92.3091, 4202.92.4500). Customs and Border Protection (CBP) refers to travel bags as those that provide storage, protection, portability, and organization to personal effects during travel. ${ }^{8}$ These bags include a variety of styles, which can include bags with double handles for carrying by hand or by shoulder, or a single shoulder strap. These classifications include "duffel" style bags and tote bags. These bags may or may not have exterior pockets. In addition to travel, these bags may be used for storing clothing and personal items for carrying sports uniforms and equipment, and for other uses. Also included in these subheadings are toiletry bags, which are designed to contain toiletries and other small personal effects during travel.

This petition also includes smaller containers, such as pouches, cell phone cases, and iPad cases made of leather (4202.91.0090). Three other HTSUS numbers cover an array of man-made fibers, plastic sheeting, or vulcanized fiber or paperboard bags, such as tool bags, tool organizers, or trunk organizers, wine bottle bags, jewelry cases, cases for car remote entry devices, cellular phone and tablet computer carrying cases, and drawstring bags (4202.92.9026, 4202.92.9060, 4202.99.9000). These items may appear similar to travel or toiletry bags covered in other HTS numbers but have a specific purpose other than travel or sports, such as storing or carrying tools or other specific devices and items.

Worldwide, almost 2 billion bags were imported under these categories in 2014, valued at over $\$ 9.6$ billion.

## B. Current Tariff Treatment:

[^3]The travel goods covered by this petition and their Most Favored Nation (MFN) tariff rates are:

## 1. Luggage:

4202.11.0030 Attaché cases, briefcases, school satchels, occupational luggage cases and similar containers of leather ( 8 percent)
4202.11.0090 Attaché cases, briefcases, other (8 percent)
4202.12.2020 Trunks, suitcases, vanity cases and similar containers with outer surfaces of plastics, structured, rigid on all sides ( 20 percent)
4202.12.2050 Trunks, suitcases, vanity cases and similar containers with outer surface of plastics materials, NESOI $^{9}$ ( 20 percent)
4202.12.4000 Trunks, suitcases, vanity \& attaché cases, occupational luggage \& like containers, surfaces of cotton, not of pile or tufted construction (6.3 percent)
Attaché cases, briefcases, school satchels, occupational luggage cases and similar containers, of man-made fibers ( 17.6 percent)
4202.12.8070 Trunks, suitcases, vanity cases \& similar containers, etc., with outer surface of textile materials, of man-made fibers (17.6 percent)

## 2. Handbags:

4202.21.6000 Handbags, with or without shoulder strap or without handle, with outer surface of leather, composition or patent leather, NESOI, not over \$20 each (10 percent)
4202.21.9000 Handbags with or without shoulder strap or without handle, with outer surface of leather, composition or patent leather, NESOI, over \$20 each (9 percent)
4202.22.1500 Handbags, with or without shoulder straps or without handle, with outer surface of sheeting of plastics ( 16 percent)
4202.22.4500 Handbags with or without shoulder strap or without handle, with outer surface of cotton, not of pile or tufted construction or braid ( 6.3 percent)
4202.22.8050 Handbags, outer surface textile material, expect braid, pile or tufted construction, of man-made fiber. (17.6 percent)

## 3. Pocket Goods:

4202.31.6000 Articles of a kind normally carried in the pocket or handbag, with outer surface of leather, composition or patent leather, NESOI (8 percent)
4202.32.4000 Articles of a kind normally carried in the pocket or handbag, with outer surface of cotton, not of pile or tufted construction. (6.3 percent)
4202.32.8000 Articles of a kind normally carried in the pocket or handbag, with outer surface of vegetable fibers, not of pile or tufted construction, NESOI (5.7 percent)

[^4]| 4202.32.9550 | Articles for pocket or handbag, with outer surface of textiles, of man-made <br> fibers (17.6 percent) |
| :--- | :--- |
| 4202.32 .9560 | Articles for pocket or handbag, with outer surface of textiles, NESOI (17.6 <br> percent) |

## 4. Backpacks, sports and travel bags:

| 4202.91 .0030 | Travel, sports and similar bags, outer surface of leather, composition <br> leather, or patent leather (4.5 percent) <br> Containers, with outer surface of leather, composition leather, or patent <br> leather, NESOI (4.5 percent) <br> Travel, sports and similar bags with outer surface of cotton, not of pile or <br> tufted construction (6.3 percent) <br> Travel, sports and similar bags with outer surface of vegetable fibers, excl. <br> cotton, not of pile construction (5.7 percent) |
| :---: | :--- |
| 4202.92 .1500 | Backpacks, of man-made fiber (17.6 percent) <br> Travel, sports and similar bags, except backpacks, of man-made fiber <br> (17.6 percent) |
| 4202.92 .2000 | Travel, sports \& similar bags, outer surface of textile materials, NESOI <br> (17.6 percent) |
| 4202.92 .3031 | Travel, sports and similar bags with outer surface of plastic sheeting (20 <br> percent) <br> Other bags, outer surface of man-made fibers (17.6 percent) |
| 4202.92 .3091 | Other bags and cases with outer surface of sheeting of plastic, NESOI <br> (17.6 percent) |
| 4202.92 .9026 | Cases, bags and similar containers, NESOI, with outer surface of <br> vulcanized fiber or of paperboard (20 percent) |
| 4202.99 .9000 |  |

To the extent that a new 8-digit subheading is required for implementation of any items accepted for designation as GSP eligible, the Government of the Philippines respectfully asks that the GSP Subcommittee request the U.S. International Trade Commission to create new 8 -digit subheadings reflecting the product coverage.

## C. Previous Submissions:

The Trade Preferences Extension Act of 2015, signed into law on June 29, 2015, removed the statutory exclusion on the above tariff subheadings. This is the first annual review covered by that law. The Philippines is not aware of any previously submitted petitions, but, if there were any, none would have been accepted for review due to the statutory exclusion.

## III. CURRENT PRODUCTION IN THE PHILIPPINES

## A. Current Known Producers:

[
[
]
[
]
[
]
[
]
[
]

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B. Current Production by HTSUS Subheading: [
[

## C. Capacity and Capacity Utilization:

[

## ]

D. Costs:

While not every factory was able to supply cost information, [ ], [ ] and [ all reported current production costs for travel goods at approximately [ ] percent material, [ ] percent labor, and [ ] percent overhead.

## E. Employment:

In general, producers of travel goods are a significant employer in BDCs, and the Philippines is a prime example. In general, the travel factories achieve an economy of scale at 500 to 1,000 workers. The [ ] facility employs [ ] workers, up from just over [ ] in 2012. The [ ] facilities employ [ ] workers. The [ ] facility employs [ ] workers, and the [ ] facility employs around [ ].

Wages in the Philippines vary based on the level of development of the region at issue. Petitioners are aware of travel goods production in Region III, which includes Clark and Tarlac. [

## F. Sales:

Overall U.S. sales for GSP eligible travel goods surpassed $\$ 24.9$ billion in 2014 based on multipliers utilized by leading U.S. private sector groups. These vary depending on the type of product being imported.

Retail sales for luggage in the United States are estimated to have surpassed $\$ 3.1$ billion in 2014, with sales from BDCs accounting for $\$ 164.6$ million in U.S. retail sales in 2014. ${ }^{11}$

Retail sales handbags approached $\$ 8.2$ billion in 2014. Retail sales of imports from BDCs accounted for approximately $\$ 375$ million in sales in $2014 .{ }^{12}$

Sales for pocket goods approached $\$ 1.6$ billion in 2014, and include sourcing from a number of GSP BDCs including the Philippines. Imports from BDCs accounted for approximately $\$ 335$ million in sales in $2014 .{ }^{13}$

Retail sales for backpacks, sports and travel bags were over $\$ 12$ billion in 2014 in the U.S. market, and include sourcing from a number of GSP BDCs, such as Cambodia, India, Indonesia, Pakistan, the

[^5]Philippines, and Thailand. Retail sales of imports from BDCs are estimated to have accounted for approximately $\$ 592$ million in sales in 2014. ${ }^{14}$

## G. Exports and Exports to the United States:

The United States has consistently been the largest export market for the Philippines for total travel goods, including petition products listed on the cover page of this petition. In 2014, the U.S. accounted for 56 percent of Philippine exports of travel goods, compared to 12 percent to Japan. The Philippines and Japan have a free trade agreement which provides duty-free treatment of travel goods. Germany ( 6.0 percent), China ( 5.7 percent), and the Netherlands ( 3.1 percent) are the other top markets for the Philippines. All told, the Philippines has exported travel goods to 69 countries since 2012, although many of those markets have not been steady.

## Exports to the U.S.

The Philippines continues to hold a small but significant share of the market for travel goods sourcing to the United States, exporting under all twenty-eight 10-digit HTS subheadings now eligible for consideration for duty-free under GSP. Given China's market dominance, petitioners feel that it is reasonable to consider this diverse presence as evidence that the Philippines - and other BDCs - could readily compete with China for market share in the absence of duties. Philippine companies manufacture numerous types of travel goods made from various materials, including leather, plastic and textiles, including vegetable fibers. Travel goods manufactured in the Philippines are made from imported and domestically-made materials. The imported materials are usually flat rolls or sheets of leather, plastic or fabric, which are then cut-to-shape of components, then fully assembled into handbags, backpacks, etc. Such travel goods often contain features such as zippers, buckles and other accessories, some of which are made in the Philippines. Cut to shape of components from rolled or flat material, which are then wholly assembled into a finished good, is generally considered a double substantial transformation, and as such, the components are treated as originating in the BDC for purposes of determining whether the 35 percent value-added minimum is satisfied.

## Luggage

| Luggage |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Country | HTS Number | 2012 | 2013 | 2014 | 2015 YTD | 2012 | 2013 | 2014 | 2015 YTD | 2012 | 2013 | 2014 | 2015 YTD |
|  |  | In Actual Dollars |  |  |  | In Actual Units of Quantity |  |  |  | Unit Price |  |  |  |
| Philippines | 4202128030 | 1,240,137 | 3,517,811 | 993,001 | 11,011 | 101,489 | 339,136 | 96,900 | 184 | 12.22 | 10.37 | 10.25 | 59.84 |
| . | 4202110030 | 48,331 | 23,103 | 656,473 | 1,040,830 | 383 | 143 | 12,320 | 24,718 | 126.19 | 161.56 | 53.29 | 42.11 |
| . | 4202128070 | 220,409 | 112,808 | 102,296 | 17,327 | 49,448 | 6,781 | 1,189 | 1,887 | 4.46 | 16.64 | 86.04 | 9.18 |
| . | 4202122050 | 13,794 | 1,961 | 26,774 | 29,377 | 153 | 69 | 283 | 1,651 | 90.16 | 28.42 | 94.61 | 17.79 |
| . | 4202110090 | 1,851 | 2,491 | 1,695 | 292 | 71 | 178 | 23 | 3 | 26.07 | 13.99 | 73.70 | 97.33 |
| . | 4202122020 | 0 | 0 | 700 | 3,342 | 0 | 0 | 7 | 4 | N/A | N/A | 100.00 | 835.50 |
| Total |  | 1,524,522 | 3,658,174 | 1,780,939 | 1,102,179 | 151,544 | 346,307 | 110,722 | 28,447 | 10.06 | 10.56 | 16.08 | 38.74 |

Exports in the luggage category have shown uneven growth for the Philippines. Exports hit a high in 2013 with 346,000 units, but decreased over 50 percent in 2014. The strongest HTS subheading for the Philippines in this product group is leather professional bags, including attaché cases and briefcases, with almost 100,000 units in 2014.

[^6]
## Handbags

| Handbags |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Country | HTS Number | 2012 | 2013 | 2014 | 2015 YTD | 2012 | 2013 | 2014 | 2015 YTD | 2012 | 2013 | 2014 | 2015 YTD |
|  |  | In Actual Dollars |  |  |  | In Actual Units of Quantity |  |  |  | Unit price in dollars/units |  |  |  |
| Philippines | 4202224500 | 12,370,034 | 23,000,988 | 15,665,215 | 2,043,130 | 804,684 | 1,769,713 | 1,146,488 | 369,889 | 15.37 | 13.00 | 13.66 | 5.52 |
|  | 4202219000 | 1,680,946 | 3,301,291 | 13,830,395 | 18,792,728 | 45,912 | 117,974 | 422,342 | 619,920 | 36.61 | 27.98 | 32.75 | 30.31 |
|  | 4202216000 | 2,650,484 | 6,137,513 | 4,705,691 | 1,535,674 | 217,879 | 471,567 | 382,655 | 82,528 | 12.16 | 13.02 | 12.30 | 18.61 |
| . | 4202221500 | 765,094 | 2,158,546 | 3,399,190 | 9,586,495 | 39,981 | 191,982 | 170,231 | 392,187 | 19.14 | 11.24 | 19.97 | 24.44 |
| . | 4202228050 | 561,587 | 1,078,490 | 1,816,318 | 1,964,191 | 60,271 | 59,202 | 94,107 | 106,788 | 9.32 | 18.22 | 19.30 | 18.39 |
| Total |  | 18,028,145 | 35,676,828 | 39,416,809 | 33,922,218 | 1,168,727 | 2,610,438 | 2,215,823 | 1,571,312 | 15.43 | 13.67 | 17.79 | 21.59 |

Handbags are an important category for the Philippines, accounting for over 2.2 million units in exports in 2014. While the total number of units saw a 15 percent drop from 2013 to 2014, 2015 YTD numbers appear strong. While the Philippines exports bags under all the handbag categories now eligible for GSP, cotton handbags under 4202.22.4500 have dominated other categories until 2015. The dollar value of exports for these products was just under \$40 million in 2014.

## Pocket Goods

| Pocket Goods |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Country | HTS Number | 2012 | 2013 | 2014 | 2015 YTD | 2012 | 2013 | 2014 | 2015 YTD | 2012 | 2013 | 2014 | 2015 YTD |
|  |  | In Actual Dollars |  |  |  | In Actual Units of Quantity |  |  |  | Unit Price |  |  |  |
| Philippines | 4202316000 | 275,418 | 2,114,128 | 6,923,740 | 6,443,155 | 57,165 | 227,683 | 610,570 | 505,866 | 4.82 | 9.29 | 11.34 | 12.74 |
| . | 4202324000 | 3,216,432 | 4,224,637 | 6,219,032 | 1,758,112 | 879,411 | 533,153 | 563,173 | 392,194 | 3.66 | 7.92 | 11.04 | 4.48 |
| . | 4202329550 | 456,115 | 444,983 | 385,040 | 269,670 | 564,771 | 447,367 | 437,818 | 286,819 | 0.81 | 0.99 | 0.88 | 0.94 |
| . | 4202329560 | 373 | 8,205 | 17,319 | 506 | 2,118 | 2,179 | 1,414 | 46 | 0.18 | 3.77 | 12.25 | 11.00 |
| . | 4202328000 | 4,147 | 2,936 | 811 | 0 | 3,290 | 3,448 | 95 | 0 | 1.26 | 0.85 | 8.54 | N/A |
| Total |  | 3,952,485 | 6,794,889 | 13,545,942 | 8,471,443 | 1,506,755 | 1,213,830 | 1,613,070 | 1,184,925 | 2.62 | 5.60 | 8.40 | 7.15 |

Pocket goods have remained a healthy part of the travel goods business for the Philippines. While the dollar values are not as large as other categories, it is important to note that the Philippines have exported under all the relevant HTS subheadings now available for GSP duty-free treatment.

| Backpacks, Sports and Travel Bags |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Country | HTS Number | 2012 | 2013 | 2014 | 2015 YTD | 2012 | 2013 | 2014 | 2015 YTD | 2012 | 2013 | 2014 | $\begin{gathered} \hline 2015 \\ \text { YTD } \\ \hline \end{gathered}$ |
|  |  | In Actual Dollars |  |  |  | In Actual Units of Quantity |  |  |  | Unit Price in actual dollars/units |  |  |  |
| Philippines | 4202910030 | 3,220,081 | 7,284,649 | 24,046,128 | 24,878,301 | 74,656 | 171,722 | 574,847 | 567,562 | 43 | 42 | 42 | 44 |
| . | 4202921500 | 3,823,788 | 11,995,159 | 18,503,083 | 2,186,715 | 301,102 | 480,769 | 749,565 | 150,781 | 13 | 25 | 25 | 15 |
| . | 4202923020 | 26,515,050 | 18,507,033 | 16,907,761 | 16,317,791 | 1,179,150 | 670,237 | 744,707 | 728,639 | 22 | 28 | 23 | 22 |
| . | 4202923031 | 9,117,593 | 11,405,321 | 12,596,744 | 5,831,855 | 2,773,267 | 1,982,209 | 2,453,493 | 1,616,478 | 3 | 6 | 5 | 4 |
| . | 4202924500 | 2,612,650 | 2,154,821 | 8,718,770 | 10,412,978 | 1,048,591 | 446,289 | 675,740 | 658,279 | 2 | 5 | 13 | 16 |
| . | 4202929026 | 997,219 | 919,782 | 919,160 | 558,813 | 577,769 | 283,126 | 138,661 | 85,861 | 2 | 3 | 7 | 7 |
| . | 4202929060 | 32,825 | 179,782 | 205,584 | 1,008,331 | 6,444 | 363,788 | 27,312 | 88,810 | 5 | 0 | 8 | 11 |
| . | 4202999000 | 148,922 | 219,017 | 160,800 | 119,243 | 56,204 | 74,968 | 39,332 | 27,126 | 3 | 3 | 4 | 4 |
| . | 4202910090 | 53,908 | 38,033 | 136,465 | 259,902 | 2,043 | 1,128 | 12,660 | 20,419 | 26 | 34 | 11 | 13 |
| . | 4202922000 | 83,063 | 19,671 | 33,978 | 66,146 | 17,003 | 3,763 | 3,272 | 3,204 | 5 | 5 | 10 | 21 |
| . | 4202923091 | 9,790 | 14,371 | 17,190 | 8,610 | 3,105 | 4,828 | 6,141 | 4,100 | 3 | 3 | 3 | 2 |
| Total |  | 46,614,889 | 52,737,639 | 82,245,663 | 61,648,685 | 6,039,334 | 4,482,827 | 5,425,730 | 3,951,259 | 8 | 12 | 15 | 16 |

The backpack, sports and travel bag category is the largest category for the Philippines, with over 5 million units exported to the United States in 2014. This category includes man-made fiber and leather sports and travel bags as well as man-made fiber backpacks.

## H. Profitability:

[
]

## IV. COMPETITION

In preparing this petition, the Philippines did not find evidence of meaningful competition among BDC countries, due to small market share when compared with China. Rather, in discussions with current and potential customers, current sourcing plans if these items are made eligible involve shifting production from non-BDCs to BDCs, including the Philippines. Companies generally have reported interest in expanding current work with BDC partners, or moving business from China into additional BDCs, if GSP eligibility is approved.

## V. U.S. DOMESTIC INDUSTRY

To the knowledge of the Government of the Philippines, there is no commercial production of travel goods in the United States. We tried to identify U.S. Government and private sector sources for this information, but could not find any.

Past actions by the U.S. Government indicate that the shift to non-U.S., particularly Asian production, is a long-standing shift in the industry that will not be reversed. Textile luggage included in HTSUS Chapter 42 was among the first to be removed from quota treatment under World Trade Organization (WTO) Agreement on Textiles and Clothing, and was integrated by 2002. This indicates that the United States considered this category among the least import-sensitive textile items.

In addition, many of these goods are included in the Haiti preference program, which was negotiated with U.S. stakeholders to avoid sensitive products. Recent free trade agreement language confirms this lack of sensitivities. In the U.S.-Korea Free Trade Agreement (KORUS), all of subheading 4202 was
made immediately duty-free upon implementation. In the U.S.-Dominican Republic-Central America Free Trade Agreement (DR-CAFTA), the goods covered by this petition were all given immediate dutyfree status, while some other travel goods were phased in to duty-free treatment. As further evidence of the lack of sensitivity, textile travel goods are subject to a liberal tariff shift rule of origin rather than a yarn-forward rule of origin in CAFTA-DR and KORUS.

Not surprisingly, the ITC has found no domestic sensitivities for travel goods. Textile travel goods covered by subheading 4202 were studied by the U.S. International Trade Commission in a 2007 study and found that not only were travel goods no longer made in the United States, it was difficult to find producers of the inputs for travel goods in the United States (USITC Publication 3957, October 2007). As can be seen from the data in Appendix A, this pattern continues. There are some high value products made in Europe, but the mass consumer market has long since moved to Asia and remains there.

## VI. EXPECTED BENEFITS

Granting travel goods GSP duty-free benefits would greatly benefit the Philippines and other BDCs. Currently Cambodia, India, and Indonesia also produce modest amounts of travel goods. All of these GSP members would see increased employment and trade with the United States as a result of duty-free treatment.

In addition, the Philippines and other BDCs would see significant interest in additional investments in infrastructure, new factories, and expansions of existing factories if duty-free treatment is granted. This can be seen in the discussion of capacity in Section IV.C, above. Current producers are planning on adding substantial new capacity if the requested products are provided GSP benefits. The Government of the Philippines is aware of a number of U.S. brands and retailers that do not currently import from the Philippines but have solid plans for sourcing new production of travel goods here if GSP benefits become available. The Philippines Government understands that these companies have separately indicated such plans in petitions filed in this annual review and would like to include by reference such discussions in this petition. Given current industry trends and a review of the production at current known facilities, each additional factory would employ at least 500 to 1,000 workers, although that number can be significantly higher over time as skills are gained and investment progressively increases. The Government of the Philippines expects that production could double over the next one to two years. ${ }^{15}$

## VII. CONCLUSION

The Government of the Philippines respectfully requests that the GSP Subcommittee and the Trade Policy Staff Committee recommend adding the products identified in this petition to the list of products that are eligible for duty-free treatment under the Generalized System of Preferences.

Thank you for your consideration of this petition request.

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Ceferino S. "Perry" Rodolfo
Assistant Secretary
Department of Trade and Industry Government of the Philippines


Raymond Batac
Commercial Attaché
Philippine Trade \& Investment Center, Washington, D.C.

Appendix A
Import Data for Petition Products From the Philippines By HTS Subheading



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| 4202328000 <br> ARTICLES FOR POCKET OR HANDBAG,OF VEGETABLE FIBERS AND NOT OF PILE OR TUFTED CONSTRUCTION,NESOI | China | 2,690,659 | 6,066,948 | 6,240,182 | 91.1\% | 3,892,820 | 2,424,251 | 3,746,622 | 2,672,827 | 85.7\% | 1,859,321 | 1.11 | 1.62 | 2.33 | 2.09 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Vietnam | 39,681 | 15,237 | 5,278 | 0.1\% | 11,205 | 5,550 | 8,421 | 2,061 | 0.1\% | 3,467 | 7.15 | 1.81 | 2.56 | 3.23 |
|  | Philippines | 4,147 | 2,936 | 811 | 0.01\% | 0 | 3,290 | 3,448 | 95 | 0.00\% | 0 | 1.26 | 0.85 | 8.54 | \#DIV/0! |
|  | Total GSP | 196,408 | 186,202 | 187,916 | 3\% | 233,713 | 62,384 | 199,542 | 117,613 | 3.8\% | 129,866 | 3.15 | 0.93 | 1.60 | 1.80 |
|  | World | 3,306,512 | 6,842,307 | 6,851,745 | 100\% | 4,275,005 | 2,591,472 | 4,088,572 | 3,120,068 | 100\% | 2,029,257 | 1.28 | 1.67 | 2.20 | 2.11 |
| 4202329550ARTICLES FOR POCKET OR HANDBAG,WITHOUTER SURFACE OF TEXTILES,OF MAN-MADEFIBERS | China | 65,597,457 | 65,487,040 | 59,508,990 | 86.4\% | 31,865,603 | 83,681,914 | 86,026,829 | 70,614,779 | 93.9\% | 37,894,822 | 0.78 | 0.76 | 0.84 | 0.84 |
|  | Vietnam | 1,367,024 | 1,295,784 | 1,148,934 | 1.7\% | 1,394,989 | 404,193 | 435,520 | 601,114 | 0.8\% | 377,743 | 3.38 | 2.98 | 1.91 | 3.69 |
|  | Philippines | 456,115 | 444,983 | 385,040 | 0.6\% | 269,670 | 564,771 | 447,367 | 437,818 | 0.6\% | 286,819 | 0.81 | 0.99 | 0.88 | 0.94 |
|  | Total GSP | 2,165,794 | 2,984,580 | 3,317,057 | 4.8\% | 2,404,691 | 1,523,737 | 2,961,734 | 1,953,304 | 2.6\% | 4,032,286 | 1.42 | 1.01 | 1.70 | 0.60 |
|  | World | 77,222,456 | 76,236,580 | 68,837,075 | 100\% | 40,425,936 | 88,239,289 | 92,430,082 | 75,234,684 | 100\% | 44,045,687 | 0.88 | 0.82 | 0.91 | 0.92 |
| 4202329560 <br> ARTICLES FOR POCKET OR HANDBAG,WITH OUTER SURFACE OF TEXTILES, NESOI | China | 2,795,683 | 4,510,085 | 4,692,829 | 80\% | 2,980,516 | 2,431,788 | 4,696,623 | 5,124,536 | 92.4\% | 3,620,933 | 1.15 | 0.96 | 0.92 | 0.82 |
|  | Philippines | 373 | 8,205 | 17,319 | 0.3\% | 506 | 2,118 | 2,179 | 1,414 | 0.03\% | 46 | 0.18 | 3.77 | 12.25 | 11.00 |
|  | Vietnam | 1,027 | 12,133 | 579 | 0.01\% | 130,546 | 1,341 | 3,686 | 422 | 0.01\% | 17,338 | 0.77 | 3.29 | 1.37 | 7.53 |
|  | Total GSP | 295,353 | 353,679 | 213,215 | 4\% | 170,560 | 179,437 | 154,309 | 122,580 | 2.2\% | 74,380 | 1.65 | 2.29 | 1.74 | 2.29 |
|  | World | 3,516,037 | 5,379,066 | 5,867,881 | 100\% | 4,043,120 | 2,838,678 | 5,011,695 | 5,548,122 | 100\% | 3,874,368 | 1.24 | 1.07 | 1.06 | 1.04 |
| 4202910030 <br> TRAVEL,SPORTS AND SIMILAR BAGS,OUTER <br> SURFACE OF LEATHER,COMPOSITION <br> LEATHER,OR PATENT LEATHER | China | 409,853,490 | 443,890,332 | 458,847,717 | 49.9\% | 242,899,800 | 9,199,359 | 9,829,901 | 10,438,768 | 59.4\% | 5,809,503 | 44.55 | 45.16 | ${ }^{43.96}$ | 41.81 |
|  | Vietnam | 65,972,930 | 136,586,217 | 164,190,647 | 17.9\% | 76,789,138 | 1,370,676 | 2,898,316 | 3,337,552 | 19.0\% | 1,516,189 | 48.13 | 47.13 | 49.19 | 50.65 |
|  | Philippines | 3,220,081 | 7,284,649 | 24,046,128 | 2.6\% | 24,878,301 | 74,656 | 171,722 | 574,847 | 3.3\% | 567,562 | 43.13 | 42.42 | 41.83 | 43.83 |
|  | Total GSP | 33,419,231 | 52,603,024 | 63,335,335 | 6.9\% | 48,334,462 | 909,432 | 1,362,178 | 1,607,416 | 9.1\% | 1,173,267 | 36.75 | 38.62 | 39.40 | 41.20 |
|  | World | 749,277,547 | 822,537,124 | 919,431,940 | 100\% | 505,332,840 | 12,289,941 | 15,176,180 | 17,575,119 | 100\% | 10,025,268 | 60.97 | 54.20 | 52.31 | 50.41 |
| 4202910090 <br> CONTAINERS, WITH OUTER SURFACE OF <br> LEATHER,COMPOSITION LEATHER OR PATENT <br> LEATHER,NESOI | China | 90,029,908 | 106,354,407 | 111,757,966 | 52\% | 51,370,306 | 17,903,296 | 19,614,432 | 20,065,748 | 75.0\% | 9,520,830 | 5.03 | 5.42 | 5.57 | 5.40 |
|  | Vietnam | 6,416,539 | 13,131,557 | 16,406,941 | 8\% | 11,853,264 | 680,448 | 892,243 | 1,214,041 | 4.5\% | 884,206 | 9.43 | 14.72 | 13.51 | 13.41 |
|  | Philippines | 53,908 | 38,033 | 136,465 | 0.06\% | 259,902 | 2,043 | 1,128 | 12,660 | 0.05\% | 20,419 | 26.39 | 33.72 | 10.78 | 12.73 |
|  | Total GSP | 21,052,545 | 20,529,885 | 19,962,594 | 9\% | 11,286,807 | 2,238,812 | 2,449,271 | 2,562,563 | 9.6\% | 1,522,151 | 9.40 | 8.38 | 7.79 | 7.42 |
|  | World | 187,319,482 | 222,366,733 | 216,069,750 | 100\% | 119,451,281 | 24,475,027 | 26,511,302 | 26,744,202 | 100\% | 13,802,532 | 7.65 | 8.39 | 8.08 | 8.65 |
| 4202921500 <br> TRAVEL,SPORTS AND SIMILAR BAGS,OUTER SURFACE OF COTTON | China | 388,679,911 | 352,749,084 | 331,182,226 | 75.4\% | 190,654,133 | 62,478,518 | 63,590,458 | 64,719,936 | 76.2\% | 43,070,882 | 6.22 | 5.55 | 5.12 | 4.43 |
|  | Vietnam | 48,634,723 | 53,986,369 | 38,279,306 | 8.7\% | 19,873,917 | 2,826,456 | 2,978,741 | 1,784,252 | 2.1\% | 1,059,261 | 17.21 | 18.12 | 21.45 | 18.76 |
|  | Philippines | 3,823,788 | 11,995,159 | 18,503,083 | 4.2\% | 2,186,715 | 301,102 | 480,769 | 749,565 | 0.9\% | 150,781 | 12.70 | 24.95 | 24.69 | 14.50 |
|  | Total GSP | 33,720,269 | 37,023,602 | 50,330,859 | 11.5\% | 24,851,871 | 13,040,548 | 13,063,702 | 16,766,793 | 19.7\% | 11,231,442 | 2.59 | 2.83 | 3.00 | 2.21 |
|  | World | 490,672,079 | 459,753,542 | 439,145,083 | 100\% | 250,106,618 | 79,530,604 | 81,372,880 | 84,927,591 | 100\% | 56,528,548 | 6.17 | 5.65 | 5.17 | 4.42 |
| 4202922000 <br> TRAVEL,SPORTS AND SIMILAR BAGS,OUTER SURFACE EXCEPT OF COTTON | China | 27,162,891 | 23,012,320 | 22,956,502 | 70.4\% | 15,021,775 | 7,367,058 | 7,221,619 | 7,699,681 | 56.43\% | 5,410,080 | 3.69 | 3.19 | 2.98 | 2.78 |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Vietnam | 446,233 | 884,837 | 205,943 | 0.6\% | 234,608 | 23,644 | 202,116 | 28,631 | 0.21\% | 19,208 | 18.87 | 4.38 | 7.19 | 12.21 |
|  | Philippines | 83,063 | 19,671 | 33,978 | 0.1\% | 66,146 | 17,003 | 3,763 | 3,272 | 0.02\% | 3,204 | 4.89 | 5.23 | 10.38 | 20.64 |
|  | Total GSP | 3,171,306 | 5,826,158 | 7,131,966 | 21.9\% | 4,964,354 | 1,973,732 | 4,547,086 | 5,315,695 | 39.0\% | 2,988,760 | 1.61 | 1.28 | 1.34 | 1.66 |
|  | World | 32,125,868 | 31,580,328 | 32,595,317 | 100\% | 21,270,025 | 9,917,871 | 12,247,377 | 13,644,939 | 100\% | 8,643,521 | 3.24 | 2.58 | 2.39 | 2.46 |
| 4202923020 <br> BACKPACKS, OF MAN-MADE FIBER | China | 446,711,830 | 467,369,713 | 520,779,934 | 71\% | 407,581,587 | 124,404,591 | 128,485,058 | 154,504,703 | 89.6\% | 105,321,461 | 3.59 | 3.64 | 3.37 | 3.87 |
|  | Vietnam | 93,823,003 | 121,811,792 | 155,844,045 | 21.4\% | 123,304,376 | 6,170,722 | 8,835,534 | 11,865,479 | 6.9\% | 9,263,094 | 15.20 | 13.79 | 13.13 | 13.31 |
|  | Philippines | 26,515,050 | 18,507,033 | 16,907,761 | 2.3\% | 16,317,791 | 1,179,150 | 670,237 | 744,707 | 0.4\% | 728,639 | 22.49 | 27.61 | 22.70 | 22.39 |
|  | Total GSP | 39,220,357 | 36,549,330 | 37,293,450 | 5.1\% | 42,284,806 | 2,556,596 | 2,842,428 | 4,280,785 | 2.5\% | 4,813,395 | 15.34 | 12.86 | 8.71 | 8.78 |
|  | World | 592,004,285 | 641,669,209 | 729,518,505 | 100\% | 587,284,372 | 134,388,070 | 142,747,334 | 172,424,957 | 100\% | 120,691,477 | 4.41 | 4.50 | 4.23 | 4.87 |
| 4202923031 <br> TRAVEL,SPORTS AND SIMILAR BAGS,EXCEPT BACKPACKS,OF MAN-MADE FIBER | China | 898,034,098 | 903,836,466 | 885,620,812 | 84.0\% | 533,258,939 | 557,338,936 | 491,281,298 | 501,190,085 | 93.1\% | 314,910,986 | ${ }^{1.61}$ | 1.84 | 1.77 | 1.69 |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | Vietnam | 55,850,899 | 78,203,903 | 90,739,939 | 8.6\% | 50,761,689 | 13,203,509 | 17,687,153 | 20,484,400 | 3.8\% | 12,508,015 | 4.23 | 4.42 | 4.43 | 4.06 |
|  | Philippines | 9,117,593 | 11,405,321 | 12,596,744 | 1.2\% | 5,831,855 | 2,773,267 | 1,982,209 | 2,453,493 | 0.5\% | 1,616,478 | 3.29 | 5.75 | 5.13 | 3.61 |
|  | Total GSP | 46,703,556 | 41,012,826 | 41,605,244 | 3.9\% | 30,561,934 | 9,126,613 | 7,407,535 | 9,006,642 | 1.7\% | 9,214,923 | 5.12 | 5.54 | 4.62 | 3.32 |
|  | World | 1,059,083,928 | 1,063,176,472 | 1,053,704,274 | 100\% | 636,774,258 | 589,181,119 | 522,929,370 | 538,461,439 | 100\% | 344,417,347 | 1.80 | 2.03 | 1.96 | 1.85 |


| 4202923091 <br> TRAVEL,SPORTS \& SIMILAR BAGS,OUTER SURFACE OF TEXTILE MATERIALS,NESOI | China | 14,049,415 | 13,146,015 | 10,446,593 | 78.3\% | 7,885,525 | 19,076,980 | 14,082,805 | 9,770,267 | 81.4\% | 8,318,022 | 0.74 | 0.93 | 1.07 | 0.95 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Vietnam | 102,563 | 1,798,576 | 787,452 | 5.9\% | 754,088 | 28,097 | 1,003,357 | 1,436,494 | 12.0\% | 1,308,201 | 3.65 | 1.79 | 0.55 | 0.58 |
|  | Philippines | 9,790 | 14,371 | 17,190 | 0.13\% | 8,610 | 3,105 | 4,828 | 6,141 | 0.05\% | 4,100 | 3.15 | 2.98 | 2.80 | 2.10 |
|  | Total GSP | 212,838 | 416,449 | 719,678 | 5\% | 304,753 | 30,522 | 580,628 | 692,221 | 5.8\% | 164,715 | 6.97 | 0.72 | 1.04 | 1.85 |
|  | World | 16,345,070 | 16,714,613 | 13,348,174 | 100\% | 10,114,674 | 19,316,217 | 15,934,044 | 11,998,161 | 100\% | 10,004,577 | 0.85 | 1.05 | 1.11 | 1.01 |
| 4202924500 | China | 380,153,108 | 402,545,283 | 417,335,423 | 73.0\% | 216,015,904 | 155,569,023 | 171,916,648 | 168,611,618 | 85.3\% | 87,677,614 | 2.44 | 2.34 | 2.48 | 2.46 |
|  | Vietnam | 21,558,526 | 39,786,667 | 70,790,477 | 12.4\% | 38,003,716 | 11,376,270 | 14,994,324 | 23,108,652 | 11.7\% | 13,379,337 | 1.90 | 2.65 | 3.06 | 2.84 |
|  | Philippines | 2,612,650 | 2,154,821 | 8,718,770 | 1.5\% | 10,412,978 | 1,048,591 | 446,289 | 675,740 | 0.3\% | 658,279 | 2.49 | 4.83 | 12.90 | 15.82 |
|  | Total GSP | 7,064,488 | 4,772,744 | 15,973,124 | 2.8\% | 16,371,414 | 1,744,391 | 914,317 | 2,456,831 | 1.2\% | 2,529,452 | 4.05 | 5.22 | 6.50 | 6.47 |
|  | World | 519,707,220 | 523,342,328 | 572,060,784 | 100\% | 303,354,142 | 172,839,349 | 193,390,550 | 197,684,794 | 100\% | 107,015,435 | 3.01 | 2.71 | 2.89 | 2.83 |
| 4202929026 | China | 330,838,051 | 329,111,611 | 293,227,210 | 85.8\% | 161,799,207 | 120,874,507 | 113,838,837 | 102,898,741 | 85.3\% | 59,518,710 | 2.74 | 2.89 | 2.85 | 2.72 |
|  | Vietnam | 16,795,137 | 22,208,156 | 22,228,320 | 6.5\% | 11,604,699 | 4,673,522 | 7.488,835 | 10,043,359 | 8.3\% | 6837 ,676 | 3.59 | 297 | 2.21 | 1.70 |
|  | Philippines | 997,219 | 919,782 | 919,160 | 0.27\% | 558,813 | 577,769 | 283,126 | 138,661 | 0.11\% | 85,861 | 1.73 | 3.25 | 6.63 | 6.5 |
|  | Total GSP | 6,064,726 | 6,267,326 | 6,284,915 | 1.8\% | 3,622,071 | 1,904,233 | 1,748,569 | 2,008,670 | 1.7\% | 1,131,253 | 3.18 | 3.58 | 3.13 | 3.20 |
|  | World | 378,596,896 | 393,348,805 | 341,886,182 | 100\% | 188,655,404 | 134,737,269 | 129,146,443 | 120,600,947 | 100\% | 70,998,179 | 2.81 | 3.05 | 2.83 | 2.66 |
| 4202929060 | China | 218,843,465 | 215,204,709 | 210,473,781 | 73.6\% | 92,791,827 | 125,103,088 | 131,246,202 | 151,022,673 | 92\% | 74,966,667 | 1.75 | 1.64 | 1.39 | 1.24 |
|  | Vietnam | 2,564,292 | 6,019,383 | 22,753,319 | 8.0\% | 12,487,829 | 569,104 | 731,988 | 2,236,886 | 1.4\% | 1,016,834 | 4.51 | 8.22 | 10.17 | 12.28 |
|  | Philippines | 32,825 | 179,782 | 205,584 | 0.07\% | 1,008,331 | 6,444 | 363,788 | 27,312 | 0.02\% | 88,810 | 5.09 | 0.49 | 7.53 | 11.35 |
|  | Total GSP | 1,807,693 | 1,943,107 | 4,285,757 | 1.5\% | 3,388,846 | 1,118,957 | 1,152,306 | 773,980 | 0\% | 644,945 | 1.62 | 1.69 | 5.54 | 5.25 |
|  | World | 251,835,297 | 282,140,204 | 286,074,414 | 100\% | 135,446,086 | 135,665,154 | 143,537,052 | 165,011,202 | 100\% | 82,123,411 | 1.86 | 1.97 | 1.73 | 1.65 |
| 4202999000 | China | 284,566,334 | 343,396,522 | 400,709,046 | 70.4\% | 185,523,700 | 119,425,538 | 118,713,047 | 131,567,970 | 79.1\% | 66,156,719 | 2.38 | 2.89 | 3.05 | 2.80 |
|  |  |  | 1,391,222 |  |  |  |  | 232,237 | 35,874 | 0.02\% | 7,320 | 7.34 | 5.99 |  |  |
|  | Philippines | 148,922 | 219,017 | 160,800 | 0.03\% | 119,243 | 56,204 | 74,968 | 39,332 | 0.02\% | 27,126 | 2.65 | 2.92 | 4.09 |  |
|  | Total GSP | 1,460,789 | 1,412,955 | 1,048,291 | 0.18\% | 405,445 | 434,749 | 465,153 | 319,143 | 0.19\% | 107,464 | 3.36 | 3.04 | 3.28 |  |
|  | World | 404,707,367 | 460,119,959 | 568,976,356 | 100\% | 257,810,125 | 145,433,542 | 142,294,386 | 166,269,966 | 100\% | 82,942,617 | 2.78 | 3.23 | 3.42 | 3.11 |

Sources: Data on this site have been compiled from tariff and trade data from the U.S. Department of Commerce and the U.S. International Trade
Commission.

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## Appendix B

## GSP Eligible Travel Goods: Customs Value for Certain Suppliers

| Country | 2012 | 2013 | 2014 | Percent | 2015 YTD | 2012 | 2013 | 2014 | Percent | 2015 YTD | $\begin{gathered} 201 \\ 2 \end{gathered}$ | 2013 | 2014 | $\begin{gathered} 2015 \\ \text { YTD } \end{gathered}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | In Actual Dollars |  |  |  |  | In Actual Units of Quantity |  |  |  |  | Unit Price |  |  |  |
| World | 8,901,976,300 | 9,461,933,465 | 9,806,136,580 | 100.0\% | 6,754,787,121 | 1,964,670,015 | 1,939,274,164 | 1,964,154,494 | 100.0\% | 1,379,680,760 | 4.53 | 4.88 | 4.99 | 4.90 |
| GSP Total | 459,852,848 | 514,464,066 | 589,047,261 | 6.0\% | 486,233,979 | 74,275,820 | 81,175,464 | 88,450,023 | 4.5\% | 76,138,267 | 6.19 | 6.34 | 6.66 | 6.39 |
| China | 6,387,808,573 | 6,556,420,187 | 6,436,027,052 | 65.6\% | 4,367,328,271 | 1,764,493,374 | 1,714,572,023 | 1,700,421,672 | 86.6\% | 1,173,686,281 | 3.62 | 3.82 | 3.78 | 3.72 |
| Vietnam | 468,552,256 | 675,925,587 | 866,715,655 | 8.8\% | 673,231,460 | 49,103,836 | 67,464,585 | 89,133,333 | 4.5\% | 68,684,479 | 9.54 | 10.02 | 9.72 | 9.80 |
| Philippines | 74,585,377 | 101,930,877 | 145,034,230 | 1.5\% | 150,242,937 | 9,068,389 | 8,893,038 | 9,608,307 | 0.5\% | 8,727,232 | 8.22 | 11.46 | 15.09 | 17.22 |

Sources: Data has been compiled from tariff and trade data from the U.S. Department of Commerce and the U.S. International Trade Commission.
Year to Date (YTD) is through August,
2015


[^0]:    ${ }^{1}$ Even in products where the Philippines has been most successful, import values have remained below the 2015 Competitive Need Limitation level. Thus, even with significant growth, the Philippines will remain below the CNL limit ( $\$ 170$ million at the 8 -digit subheading in 2015) for some time.
    ${ }^{2}$ As will be discussed below, given the broad range in price points between different styles of travel goods, we believe quantity, rather than import value, is the most instructive unit of measure.

[^1]:    ${ }^{3} \mathrm{https}: / / u s t r . g o v / s i t e s / d e f a u l t / f i l e s / 2015-S p e c i a l-301-R e p o r t-F I N A L . p d f ~ a t ~ p a g e s ~ 6, ~ 8 ~ a n d ~ 77 . ~$
    ${ }^{4}$ As required by $15 \mathrm{CFR} \S 2007.1$ (c)(12), "If the petition is submitted by a foreign government or a government controlled entity, it should include a statement of the manner in which the requested action would further the economic development of the country submitting the petition;"

[^2]:    ${ }^{5}$ This commonly used definition is used frequently by CBP. See CBP Ruling from April 23, 2014 NY 252170: The tariff classification of a briefcase from China and April 19, 2011, NY N155419: The tariff classification of a briefcase from China.
    ${ }^{6}$ See CBP Ruling from July 9, 2015 NY N265610: The tariff classification of a trunk and various cases from China and July 8, 2015 NY N265524: The tariff classification of a trunk and plastic cases from Italy.
    ${ }^{7}$ See Customs and Border Protection ruling from November 20, 2014 NY N258520: The tariff classification of a handbag from China and October 3, 2014 NY N257030: The tariff classification of a handbag from China.

[^3]:    ${ }^{8}$ This commonly used definition is used frequently by CBP. See CBP Ruling from August 24, 2015, NY N267117: The tariff classification of a toiletry bag with a storage case from China and August 22, 2014 NY N255831: The tariff classification of a travel bag from China among others.

[^4]:    ${ }^{9}$ Not Elsewhere Specified or Indicated

[^5]:    ${ }^{10}$ Wages calculated based on an exchange rate of 1 Philippine Pesos to .02159 dollars.
    ${ }^{11}$ Sales values are calculated by multiplying dollar value of imports (General Customs Value) by industry standard multipliers, to approximate retail markup. For the purposes of this petition, the multiplier for luggage is 3.1 and 3 for professional bags such as attaché cases. Total imports for these goods were $\$ 1,018,657,653$ in 2014, and total GSP imports were $\$ 53,019,532$.
    ${ }^{12}$ Sales values are calculated by multiplying dollar value of imports by 2.8 . This formula is the generally accepted practice in the travel goods industry. Petitioners consulted leading private sector groups on this calculation. World imports were $\$ 2,899,296,551$ in 2014 and GSP imports were $\$ 134,084,131$.
    ${ }^{13}$ Sales values for pocket goods are calculated by multiplying dollar value of imports (General Customs Value) by 2.5, to approximate retail markup. World imports were $\$ 640,205,520$ in 2014 and GSP imports were valued at $\$ 134,039,110$.

[^6]:    ${ }^{14}$ Sales values are calculated by multiplying dollar value of imports by 2.2 for sports and travel bags and 3.1 for backpacks. World imports were $\$ 5,172,810,779$ in 2014 and GSP imports were $\$ 247,971,213$.

[^7]:    ${ }^{15}$ As noted above, it is impossible to know if exports of any of the products under the 28 HTS 10-digit subheadings would increase to such a degree in the near term that a Competitive Need Limitation would be triggered. Too many of the companies' plans are contingent and it will always take some time to ramp up production for products that are newly eligible for duty-free treatment. Indeed, the largest exports are for HTS number 4202.91.0030 at $\$ 24$ million for 2014 and $\$ 24.9$ million for YTD 2015. Thus, these remain far below the Competitive Need Limitation level at this point.

