

TEXTILES AND OUR MILITARY

NCTO is a unique association representing the entire spectrum of the textile sector—from fibers to finished products, and from machinery manufacturers to power suppliers, who together play a pivotal role in providing mission critical uniforms and equipment for the U.S. military. To secure domestic defense supply chains and strengthen the warm industrial base, NCTO supports the following policies and funding priorities for inclusion in the Fiscal Year 2026 (FY26) National Defense Authorization Act (NDAA) and the FY26 Defense Appropriations Bill.

- 1) The Berry Amendment. Support the integrity of the Berry Amendment and oppose any efforts to weaken the policy.
- 2) Service Branch War Reserve Inventories and Improved Scalability. To ensure sufficient military readiness, Congress must request specific information from military department leadership to detail their go-to-war items that will surge when a contingency occurs as well as specific information on their current war reserves including a list of items and quantities.
- 3) Close the Home Textiles Procurement Loophole. The loophole should be closed in the Berry Amendment that allows individual U.S. military installations to procure non-domestic textile articles such as bed and bath linens at below the Small Purchase Threshold.
- 4) Berry Amendment Clothing for Defense Contractors. Congress should require defense contractors to purchase Berry-compliant workwear and clothing for their employees.
- 5) Buy America Requirements for American Flags. New domestic procurement requirements are needed to ensure that foreign-made and counterfeit American flags are not purchased by the federal government or displayed on federal property.
- 6) DPA Title III Funding to Support U.S. Defense Clothing & Textile Industrial Base. To encourage executive action to make DPA Title III investments available, Congress should include +\$50M within Defense-Wide Procurement, Defense Production Act Purchases for the Warfighter Clothing, Textile Individual Equipment Industrial Base.
- 7) Ensure Warfighter Readiness by Procuring American-made Combat Boots. To ensure that Army and Air Force personnel are wearing the safest and highest quality American-manufactured footwear, Congress must direct the Department of Defense (DoD) to conduct a review of current footwear regulations and indicate robust support for regulation improvements that support the needs of the warfighter and the domestic industrial base.

NCTO Position

It is vital for our national security that the U.S. military maintains the ability to source high-quality, innovative textile materials, apparel, and personal equipment from U.S. textile producers. Congress can take meaningful steps in the FY26 NDAA to shore up our national security, boost domestic manufacturing, and meet the mission-critical needs of our armed services.

AMERICAN TEXTILE INDUSTRY DEFENSE PRIORITIES

I: The Berry Amendment

It is vital to America's national security that the U.S. military maintains the ability to source high-quality, innovative textile materials, apparel, and personal equipment from a vibrant U.S. textile industrial base. Key to this goal is defending and strengthening the Berry Amendment (10 USC 4862), a law requiring DoD to buy textile and clothing products made with virtually 100% U.S. content and labor to support our U.S. warm industrial base.

The U.S. textile industry provides high-tech, functional components for the U.S. government, including more than \$1.8 billion worth of vital uniforms and equipment for our armed forces annually. DoD estimates that it purchases over 8,000 different textile items, which rises to more than 30,000-line items when individual sizes are considered. As domestic suppliers, U.S. textile mills provide a secure supply chain for the highest quality goods on a timetable that our armed forces demand.

The Berry Amendment ensures that there is a stable and viable domestic supply chain for these critical defense materials. This supply chain precludes the need for the U.S. military and warfighter to be dependent on offshore suppliers in this sector, especially those in countries like China that often oppose U.S. geopolitical and strategic goals.

II: Service Branch War Reserve Inventories and Improved Scalability

Each military department within DoD is responsible for maintaining "war reserves" of critical pre-positioned stocks located in strategic geographic commands. War reserve stocks include "go to war" items – including organizational clothing and individual equipment (OCIE) and personal protective equipment (PPE) such as flame-resistant uniforms, helmets, body armor, and footwear -- integral to rapid deployments and mission readiness when contingency operations occur.

War reserve items are maintained and accounted for by each military department. However, the Defense Logistics Agency – Troop Support (DLA-TS) oversees the distribution and allocation of items pre-positioned items across the globe. It is unclear what PPE and OCIE items the military departments have in their pre-positioned war reserve inventories and if these items and quantities are sufficient to meet initial surge requirements for future contingency operations.

These concerns are elevated by recent development of service-specific go-to war items that require the defense industrial base supply chain to produce distinctive items for each service branch. Producing several iterations of standard deployment items will negatively impact the clothing and textile defense industrial base surge capability and could result in catastrophic production and delivery delays.

DLA-TS commissioned a wargame exercise in late 2023 to identify critical gaps within the domestic clothing and textile industrial base. The resulting report, released by the Center for Naval Analyses (CNA), included several independent, third-party recommendations to improve industrial base preparedness and response for future contingency operations. These recommendations included improved strategic excess stockpiling of material components/end items and how commonality and standardization of go-to-war OCIE and PPE will result in more scalability for industry to respond to

global events. Commonality of go-to-war items across the service branches will allow the domestic industrial base to manufacture PPE and OCIE items more efficiently to better meet surge demands.

Given the concern that the services may not have sufficient items in their War Reserve Stocks, to best prepare DLA for possible distribution and allocation of these pre-positioned items across the globe, Congress must request specific information from military department leadership to detail their go-to-war items that will surge when a contingency occurs as well as specific information on their current war reserves including a list of items and quantities.

III: Address the Home Textiles Procurement Loophole

DoD is required to source all textiles domestically under the Berry Amendment unless the purchase is below the Small Purchase Threshold of \$150,000. Although Congress has mandated that DoD cannot break up contracts into smaller units to circumvent the Berry Amendment, there are a number of products under the Federal Supply Classifications (FSC), including bed and bath linens and other home textiles, that are purchased in smaller amounts by individual DoD installations—even though in the aggregate these purchases would exceed the threshold.

DoD must rectify its practice of purchasing bed and bath linens and home textiles through individual installations such as bases, service schools and hospitals, which circumvents the Berry Amendment. Doing so would result in immediate cost savings as purchases of these items would be centralized under DLA, equipping the agency to better meet the services' emergency demands and driving additional support to the U.S. textile manufacturing base.

The FY24 HASC-approved NDAA contained language expressing concern about offshoring textile manufacturing and the need for the DOD and DLA to ensure national security by procuring domestically made textile goods for military use. The language also directed DLA and the Secretary of Defense to provide a report to HASC by January 1, 2024, on the feasibility of requiring certain textile goods on military installations to be procured domestically. NCTO continues to support the centralized purchase of home textiles within DLA and is awaiting delivery of this report to Congress. According to DLA, the report will be released to Congress by March 2025.

IV: Berry Amendment Clothing for Defense Contractors

One of the findings of the CNA wargame was to strengthen the Berry Amendment by expanding compliance beyond DoD. One approach to expanding Berry would be to require defense contractors to purchase Berry Amendment clothing for their employees. Essentially, this policy would ensure that the workwear that both prime contractors and subcontractors provide their employees who are directly involved in the performance of the contract is Berry compliant.

V: Domestic Procurement Requirements for American Flags

The Make American Flags in America Act (H.R.1421/S.900) applies procurement requirements consistent with the Berry Amendment to all flags purchased for display on federal property. Domestic manufacturers of American flags are under increasingly intense pressure from Chinese producers who use online marketplaces to sell cheap flags falsely claiming U.S. origin to American consumers. Without congressional action, the risk remains high that Chinese and other foreign-made American flags will continue to be unwittingly purchased by executive branch agencies and displayed on federal property.

VI: DPA Title III Funding to Support U.S. Defense Clothing & Textile Industrial Base

Title III of the Defense Procurement Act ensures the timely availability of essential domestic industrial resources to support national defense and homeland security requirements. Program management staff works with service branch leadership and the White House to identify product categories where domestic industrial capacity is significantly challenged. Title III maintains three broad focus areas: sustaining critical production, commercialization of research and development investments, and scaling of emerging technologies.

The Berry Amendment-compliant industrial base is responsible for providing 100% American-made body armor, ballistic helmets, ballistic plates, footwear, and organizational clothing and individual equipment (OCIE) for the Department of Defense. Over the past 30 years, the domestic industrial base for this category has significantly diminished, in some cases leaving a single company manufacturing mission-critical products for DoD. At the same time, federal funding for these product categories has been significantly reduced.

Recently, the Department of Defense expanded its focus on warfighter capabilities from arid/desert environments to include cold weather and jungle climates. The need for a stressed industry to respond to these emerging needs requires federal investment in this sector of the industrial base to ensure the United States can provide for our warfighters who are deployed into any environment. Currently, the DoD is considering a draft presidential determination. To secure the domestic capability for response to emerging near-peer threats and evolving environmental protection requirements and encourage Executive Action to make DPA Title III investments available, NCTO supports including +\$50M within Defense-Wide Procurement, Defense Production Act Purchases for the Warfighter Clothing, Textile Individual Equipment Industrial Base.

VII: Ensure Warfighter Readiness by Procuring American-made Combat Boots

At present, the Department of Defense continues to allow substandard Asian-manufactured, (including Chinese) footwear to be available for direct purchase by soldiers and airmen at Army Air Force Exchange Service (AAFES) on-base locations as well as at commercial re-sellers.

Determinations regarding the appropriate approved footwear are currently made by unit-level commanders across the force, resulting in a wide disparity of footwear worn by warfighters. Over the past four years, a sharp increase in the sales of foreign-made, non-Berry-compliant footwear has occurred, and the quantity of lower-quality, foreign-made footwear worn by Soldiers and Airmen has grown significantly.

To ensure that Army and Air Force personnel are wearing the safest and highest quality American-manufactured footwear, Congress must direct the Department of Defense to conduct a review of current footwear regulations and indicate robust backing for regulation improvements that support the needs of the warfighter and the domestic industrial base.