

## CLOSING THE DE MINIMIS LOOPHOLE

### Background

Originally conceived for travelers returning from abroad with souvenirs, today the de minimis exemption has become “China’s free trade agreement” and a unilateral global giveaway for all products imported into the United States valued at \$800 or less, leading to widescale abuse. Chinese exporters in particular exploit de minimis to avoid paying U.S. taxes and Sec. 301 penalty tariffs, and to funnel all manner of illegal and illicit goods to Americans’ doorsteps with virtually zero scrutiny, including fentanyl and its precursors, banned apparel and other goods made with forced labor, and counterfeit and unsafe products, among others—ensuring that de minimis trade poses a high risk for trade violations.<sup>1</sup>

The volume of packages claiming de minimis has exploded from 150 million in FY 2016 to 1.4 billion individual packages in FY 2024, equating to 4 million per day. This trade has now become “de maximus,” with 30 percent of all de minimis shipments reportedly originating with just two Chinese e-commerce juggernauts, Shein and Temu, who have made exploiting de minimis a central part of their business strategy. As a result, U.S. Customs and Border Protection (CBP) is overwhelmed and cannot effectively enforce trade in the de minimis environment, American manufacturers are facing an economic depression as cheap, duty-free de minimis Chinese goods flood the country, and our communities are reeling from the scourge of fentanyl poisonings.<sup>2</sup>

Congress must act swiftly to address de minimis and its compounding impact on our communities. NCTO supports forward leaning legislation to end de minimis abuse, including:

### The Closing the De Minimis Loophole Act (H.R.1840)

New for the 119<sup>th</sup> Congress, Ways and Means Trade Subcommittee Ranking Member Linda Sanchez (D-CA-38) has offered a comprehensive solution to address de minimis abuse by ending the duty-free provision outside of articles accompanying travelers for their personal use and gifts. The bill immediately ends de minimis treatment for packages from China and phases out de minimis for all other countries after a four-month transition period. In addition, a rulemaking process will ensure that CBP has the necessary tools and procedures to implement this change for all countries smoothly and efficiently.

By ending de minimis treatment for all packages from any source, the Closing the De Minimis Loophole Act takes a strong stance against China’s predatory actions. This approach recognizes that if given then opportunity, Chinese companies will find and exploit any available opening into our market. Ending de minimis access for all countries ensures that China cannot simply reroute banned goods by transshipping them through a third party.

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<sup>1</sup> See January 19, 2024, letter from Chairman Gallagher and Ranking Member Krishnamoorthi to Sec. Mayorkas at: <https://selectcommitteeontheccp.house.gov/sites/evo-subsites/selectcommitteeontheccp.house.gov/files/evo-media-document/1-19-24-dhs-letter-on-uflpa.pdf>

<sup>2</sup> See: <https://www.cbp.gov/frontline/buyer-beware-bad-actors-exploit-de-minimis-shipments>

### **The FIGHTING For America Act**

Senate Finance Committee Ranking Member Ron Wyden (D-OR) has proposed another approach to addressing de minimis abuse that would make import-sensitive goods like textiles and apparel ineligible for the program. In addition, the legislation also blocks de minimis treatment for goods subject to trade penalties, like anti-dumping duties, countervailing duties, Section 301 tariffs, and other remedies. It also proposes heftier penalties for shipments that flout de minimis rules and introduces a \$2 fee per shipment.

This approach addresses the threat of transshipment by eliminating entire product categories regardless of country of origin, effectively removing the incentive to reroute goods through third parties. Customs enforcement in this environment will also be aided by the removal of up to 70 percent of the current volume of packages from de minimis and redirecting the majority of goods through the formal entry environment.

### **NCTO Position**

NCTO strongly supports robust, comprehensive solutions to address the harms being perpetrated on U.S. manufacturing, American consumers, and our communities by China and other bad actors in the de minimis environment. We stand as willing and ready partners of Congress and the administration to help develop and advance comprehensive solutions to secure the trade entering our borders through long overdue reforms to the de minimis loophole.

## CUSTOMS ENFORCEMENT

### Background

Due to the volume of duties collected on textiles and apparel—traditionally around 40% of annual duties collected by Customs and Border Protection (CBP)—there is a hefty incentive for bad actors domestically and around the world to cheat the system and circumvent our trade laws. The situation has reached a tipping point where U.S. textile production has slowed significantly as demand in our free trade agreement (FTA) regions has virtually disappeared. As a result, a large portion of U.S. textile production and employment, as well as the broader Western Hemisphere textile and apparel co-production chain, is at stake if Congress and the administration do not address customs enforcement with urgency.

### Textile and Apparel Trade Fraud

The United States has an elaborate system of FTAs that tie lucrative duty-free benefits in the textile sector to a yarn-forward rule of origin, mandating for most textile/apparel items that production steps from the yarn stage forward must be conducted in the FTA region. The FTA system is defrauded when importers claim FTA tariff-free treatment even though the finished item is comprised of yarn or fabric sourced from China or another non-FTA country. This is often accomplished by falsifying documents showing that textile inputs were sourced from a legitimate textile manufacturer in the United States or the FTA region.

Unscrupulous importers use additional methods to subvert our FTA rules, including purposely misclassifying products to qualify for a lower duty rate, undervaluing goods for a lower customs assessment, and transshipping banned and non-qualifying goods through third countries to disguise them as legal imports. A proactive and robust enforcement regime is required to identify, target, and hold accountable Chinese companies and others who undermine U.S. trade laws and threaten domestic manufacturing jobs.

Experience shows that the best deterrents to trade fraud remain the very real possibility of significant economic penalties and jail time. To put teeth to enforcement, NCTO strongly supports the bipartisan [Protecting American Industry and Labor from International Trade Crimes Act \(H.R.1869\)](#) which creates a dedicated unit within the Department of Justice (DOJ) to investigate and prosecute international trade crimes, which costs the United States an estimated \$163-\$327 billion a year. Due to the sheer amount of fraud prevalent in international trade, enforcement in this sector will pay for itself many times over and create a culture of compliance in the trade.

### NCTO Position

We commend Congress for championing the creation of new dedicated enforcement resources at DOJ that support American manufacturers and workers targeted by predatory trade violations from bad actors in China and elsewhere. It is imperative that Congress strengthen customs enforcement by ensuring international trade crimes are fully investigated and that perpetrators are brought to justice.

## **TEXTILES AND U.S.-CHINA COMPETITIVENESS**

For decades, China has victimized U.S. manufacturers and workers with an aggressive set of predatory trade practices. China's illegal actions have contributed to the direct loss of over one million U.S. jobs in the domestic textile sector alone, and virtually every U.S. manufacturing sector has been similarly devastated by China's state-sponsored practices of intellectual property theft, rampant abuse of state-owned enterprises and industrial subsidies, and horrifying labor abuses in its Xinjiang region. Congress must undertake a comprehensive approach to level the playing field and boost American manufacturers' and workers' ability to compete in the face of China's detrimental industrial and trade abuses.

### **Section 301 & IEEPA Penalty Tariffs**

U.S. textile manufacturers have been enormously impacted by China's rampant intellectual property theft and myriad other predatory trade and labor practices. Long overdue and important China enforcement actions have included the imposition of Section 301 penalty tariffs on textiles and apparel originating in China and more recent additional emergency tariffs on Chinese products. NCTO supports further increases to penalty tariffs on finished textile and apparel products from China as well as other Asian countries that largely source Chinese components, while allowing for exclusions on manufacturing inputs and machinery not available elsewhere.

### **Miscellaneous Tariff Bill (MTB)**

The MTB temporarily reduces or eliminates import duties on specified raw materials and intermediate products used in manufacturing that are not produced domestically. The MTB ensures that U.S. manufacturers are not unnecessarily disadvantaged compared to foreign competitors when sourcing vital manufacturing components. Unfortunately, the current lapse in the MTB parallels a period of persistent high inflation that has further undercut U.S. manufacturing competitiveness in markets both at home and abroad. NCTO strongly supports passing a new MTB as soon as possible with retroactive effect to provide needed relief to domestic manufacturers who have been unnecessarily burdened by an extended lapse of the MTB since 2020.

### **Generalized System of Preferences (GSP)**

GSP is a trade preference program that promotes economic development for the world's poorest countries through duty-free access to the U.S. market on a range of designated products. Due to severe import-sensitivity and China's dominance in global apparel supply chains, textiles and apparel have been statutorily excluded from GSP since its inception. Any effort to expand product categories under GSP would devastate U.S. manufacturing investment and undermine our free trade agreements.

### **NCTO Position**

NCTO strongly supports meaningful congressional action to increase the ability of U.S. manufacturers to compete in a global marketplace against the worst of China's state-sponsored abuses. Such actions include supporting increased penalties on finished Chinese textiles and apparel, renewing the MTB with retroactivity, and protecting import sensitive products in preference programs like GSP.

## TAX REFORM

As Congress gets work underway to enact significant tax reform through the budget reconciliation process in 2025, NCTO supports efforts to modernize the tax code and make U.S. businesses and exports more competitive internationally and to incentivize American manufacturing. NCTO joins with other domestic manufacturers in advocating for several key tax reform elements needed to boost domestic manufacturing.

### **Full Expensing**

From 2017 through 2022, companies were permitted to receive a 100% deduction for equipment and machinery in the tax year purchases were made. Congress enacted full expensing to spur investments and ensure that the U.S. is well-positioned to attract capital in a competitive global marketplace. However, full expensing began to phase out at the beginning of 2023 and will be eliminated completely by 2027. Given that full expensing reduces the after-tax cost of capital equipment purchases, this pro-growth incentive is a vital tool, especially for manufacturers, as it frees up much-needed capital for other important uses. Failing to restore this incentive will increase costs for businesses to invest in capital equipment and will ultimately serve to weaken supply chains and impact our competitiveness.

### **Research and Development Expensing**

For nearly 70 years, the tax code recognized the importance of R&D by allowing businesses to fully deduct their R&D expenses in the same year they were incurred. Since the start of 2022, companies have been required to spread out over five years deductions for investments in domestic R&D, making R&D more costly to conduct in the United States. The private sector accounts for more than 75% of total research and development spending, with small businesses alone accounting for approximately \$90 billion of all private-sector R&D investments. With wages and salaries comprising approximately 75% of R&D spending, the R&D amortization requirement is first and foremost a jobs issue, with R&D jobs paying an average wage of more than \$155,000. Moreover, R&D spending is a significant driver of employment.

### **EBITDA Standard for Interest Deductions**

Debt financing plays an important role in providing many manufacturers with funds to finance long-term investments in equipment and facilities, which in turn supports jobs and growth and helps manufacturers remain competitive. Prior to Jan. 1, 2022, businesses' interest expense deductions were limited to 30% of their earnings before interest, tax, depreciation and amortization. Interest deductions are now limited to 30% of earnings before interest and tax. By excluding depreciation and amortization, the stricter EBIT standard acts as a tax on investment, making it more expensive for capital-intensive companies throughout the supply chain to finance job-creating growth.

### **NCTO Position**

NCTO supports key policies to support American manufacturing, including efforts to reduce the corporate tax rate and permit the immediate deduction of capital investments. We look forward to fully engaging with Congress as the budget reconciliation process develops to further and promote pro-manufacturing policies to boost U.S. textile investment, production, and employment.

## 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.

## THE FARM BILL AND AMERICAN TEXTILES

With farm bill programs currently operating under a funding extension, Congress must pass legislation to fully renew its provisions for an additional period. NCTO supports including extensions and updates in the new farm bill for the Economic Adjustment Assistance for Textile Manufacturers program (EAATM) and the Wool and Pima Cotton Trust Funds.

### Economic Adjustment Assistance for Textile Manufacturers

Instituted as a part of the 2008 farm bill, the EAATM currently provides \$0.03 per pound to manufacturers who process upland cotton, supporting the only domestic consumers of the U.S. cotton crop. The EAATM assists regions experiencing adverse economic changes that have occurred suddenly or over time, including job losses resulting from plant closures, shifting trade patterns, or regulations. EAATM payments can only be used to acquire, build, modernize, or expand domestic manufacturing facilities and other depreciable fixed assets that process cotton fiber.

The program originally authorized support for the U.S. textile industry at a rate of \$0.04 per pound on every pound of upland cotton consumed. However, provisions in that bill reduced the rate by 25% to \$0.03 per pound effective on August 1, 2012. With the recent COVID-19 pandemic highlighting the instability of some global suppliers, it is critical that the new legislation further support the U.S. textile industry to meet the need to reshore or nearshore manufacturing of critical goods and materials, and we strongly support restoring the rate to \$0.04 per pound.

### Wool and Pima Cotton Trust Funds

The Agriculture Wool Apparel Manufacturers Trust Fund and the Pima Agriculture Cotton Trust Fund help reduce the disadvantages that domestic manufacturers face from unfair trade policies. These programs help promote the American Pima cotton and wool textile and apparel production chains and allows these American producers, from farm to finished product, to compete against foreign suppliers on a more level playing field. They also maintain essential domestic capabilities in a highly globalized supply chain, which has significant implications for national security and health care preparedness.

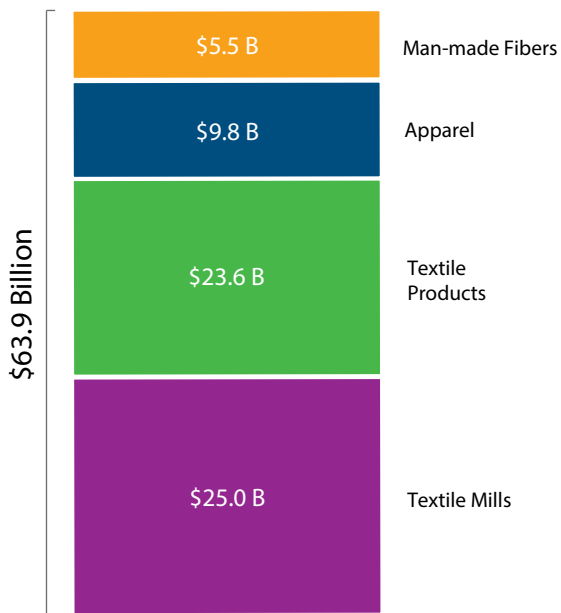
Any lapse in these critical programs will almost certainly cause the United States to lose, rather than retain and expand, key components of the domestic supply chain for defense procurement and PPE, and the domestic customer base for cotton and wool fibers, yarns, and fabrics, and domestic producers of raw Pima cotton and wool will also suffer. NCTO supports restructuring and consolidating funds for these successful programs so that they become part of the funding baseline in the new farm bill.

### NCTO Position

The farm bill contains a number of valuable programs that encourage investments in U.S. growers and ranchers that produce textile fibers and U.S. manufacturers that process cotton and wool products. These programs help the entire U.S. farm-to-finished-textile-and-apparel production chain to be more globally competitive, while supporting our national security and public health industrial base. NCTO strongly supports restoring the EAATM to \$0.04 per pound and safeguarding the Wool and Pima Cotton Trust Funds in the new farm bill.

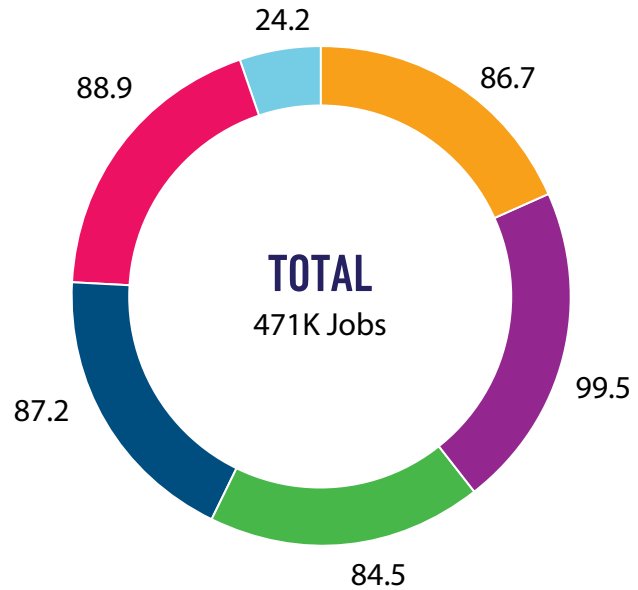
## VALUE OF SHIPMENTS<sup>1</sup>

2024 Value of Shipments for Man-Made Fibers, Yarns, Fabrics, Apparel & Sewn Products in \$ Billions



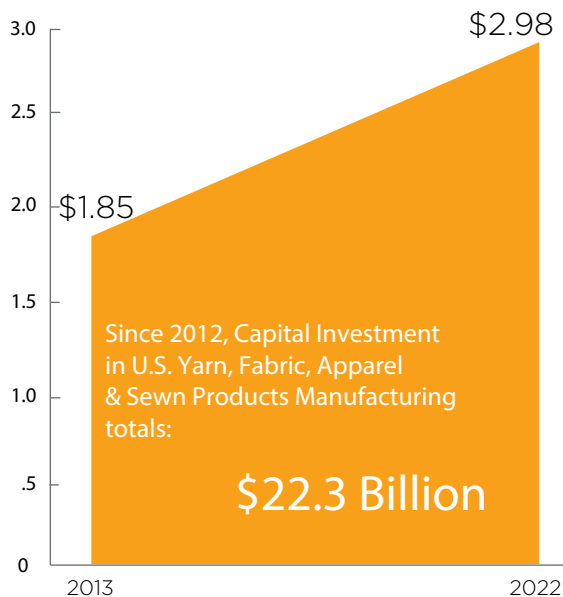
## 2024 EMPLOYMENT<sup>2</sup>

2024 Textile Supply Chain Jobs in Thousands



## CAPITAL INVESTMENT<sup>3</sup>

Capital Investment in U.S. Yarn, Fabric, Apparel & Sewn Products Manufacturing – Data in \$ Billions



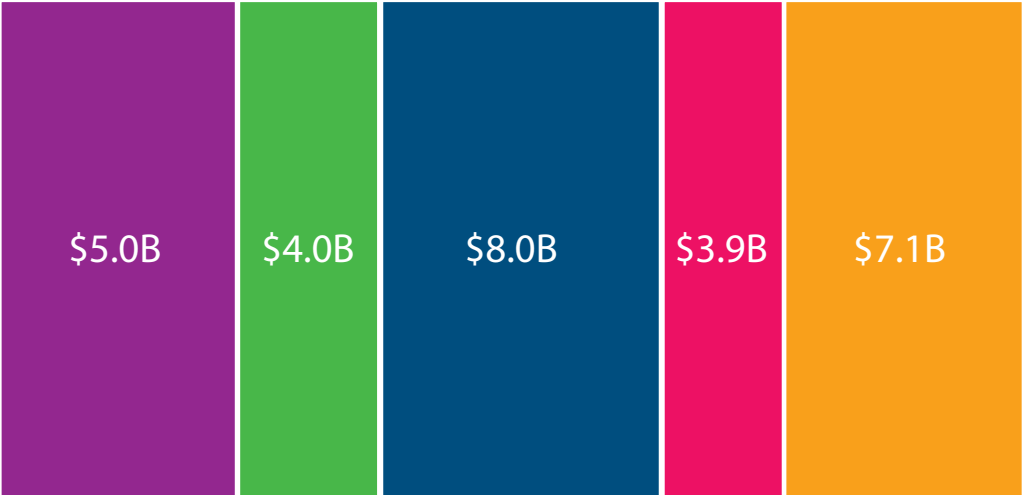
## TOP 5 STATES FOR TEXTILE JOBS IN 2024<sup>4</sup>

1. Georgia .....	39,141
2. North Carolina .....	26,798
3. South Carolina .....	14,596
4. California .....	11,649
5. Texas .....	7,484

Figures exclude apparel manufacturing and cotton & wool farming jobs.

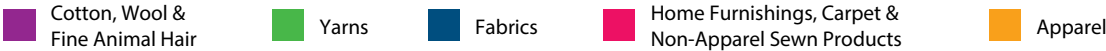
# 2024 EXPORT BREAKDOWN BY CATEGORY <sup>5</sup>

In \$ Billions



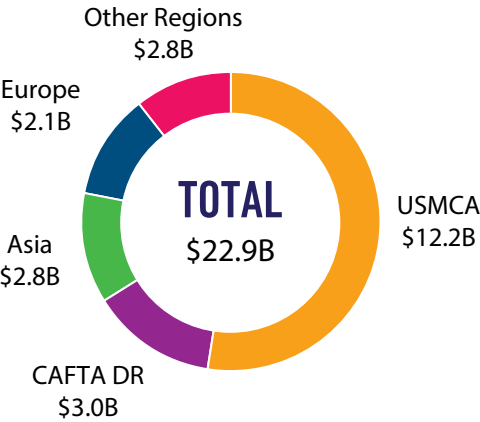
The United States is the second largest global exporter of textile-related products.

\$28.0 Billion



## 2024 EXPORT BREAKDOWN BY REGION <sup>6</sup>

In \$ Billions



Exports for U.S. Man-Made Fibers, Yarns, Fabrics, Apparel & Sewn Products only. Raw Cotton & Wool exports excluded.

## TOP 5 EXPORT MARKETS BY COUNTRY FOR U.S. FIBERS, YARNS & FABRICS <sup>7</sup>

In \$ Billions

1. Mexico	\$3.6B
2. China	\$1.9B*
3. Canada	\$1.8B
4. Honduras	\$1.2B
5. Pakistan	\$0.8B*

Figures exclude apparel & sewn products.  
\*The above totals include cotton fiber exports of \$1.5B to China and \$0.77B Pakistan.

### SOURCES:

1. 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. 2021 data used to estimate 2024 NAICS 32522 figure.
2. Bureau of Labor Statistics, National Cotton Council and American Sheep Industry Association.
3. U.S. Census Bureau, Annual Capital Expenditures Survey (ACES), NAICS 313, 314 & 315.
4. Bureau of Labor Statistics, Quarterly Census on Employment and Wages (QCEW), June 2024 NAICS 313, 314 & 32522 only.
5. U.S. Department of Commerce and U.S. International Trade Commission.
6. U.S. Department of Commerce data for Export Group 0: Textiles and Apparel.
7. U.S. International Trade Commission, data HTS chapters 50-60.

**NCTO**  
NATIONAL COUNCIL OF TEXTILE ORGANIZATIONS

**AMERICAN  
TEXTILES**  
WE MAKE AMAZING