

Regulatory Coherence in U.S./EU Apparel & Footwear Industry

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American Apparel & Footwear Association



#wewear

AAFA Snapshot

we wearSM our mission

The American Apparel & Footwear Association (AAFA) is the national trade association representing apparel, footwear and other sewn products companies, and their suppliers which compete in the global market. AAFA's mission is to promote and enhance its members' competitiveness, productivity and profitability in the global market by minimizing regulatory, legal, commercial, political, and trade restraints.

Learn more about how **AAFA wears our mission** at wewear.org >



BY THE NUMBERS

AAFA represents
530 member companies.

AAFA members account for more than
1,000 name brands.

AAFA members represent
75% of the U.S. apparel
and footwear industry.

25% of AAFA's membership
is retail.

30% of AAFA's membership
is related to footwear.



TTIP Goals

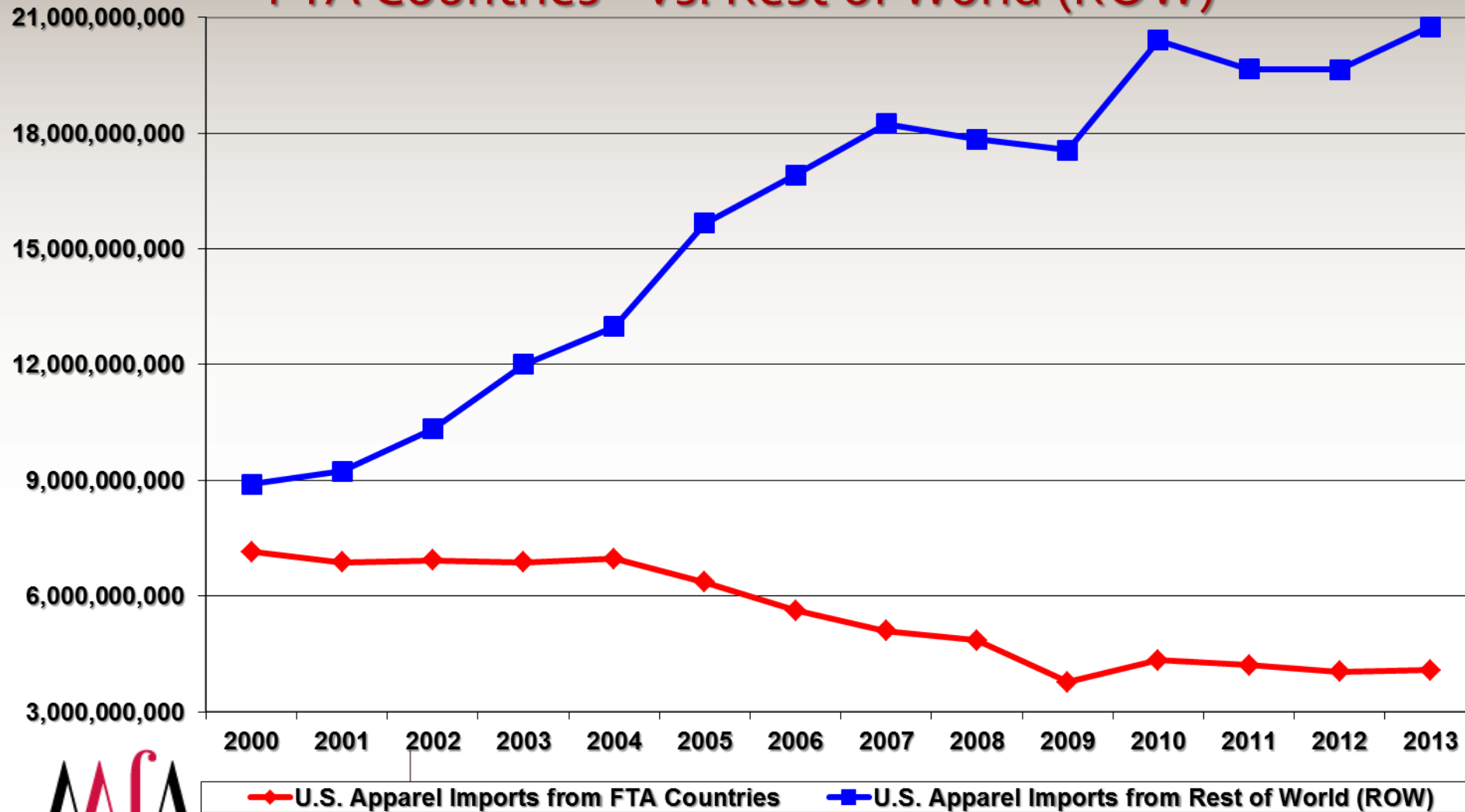
- >> Immediate and reciprocal duty-free access for ALL textile, apparel, footwear, and fashion accessories

- >> Preserve the Berry Amendment in government procurement chapter

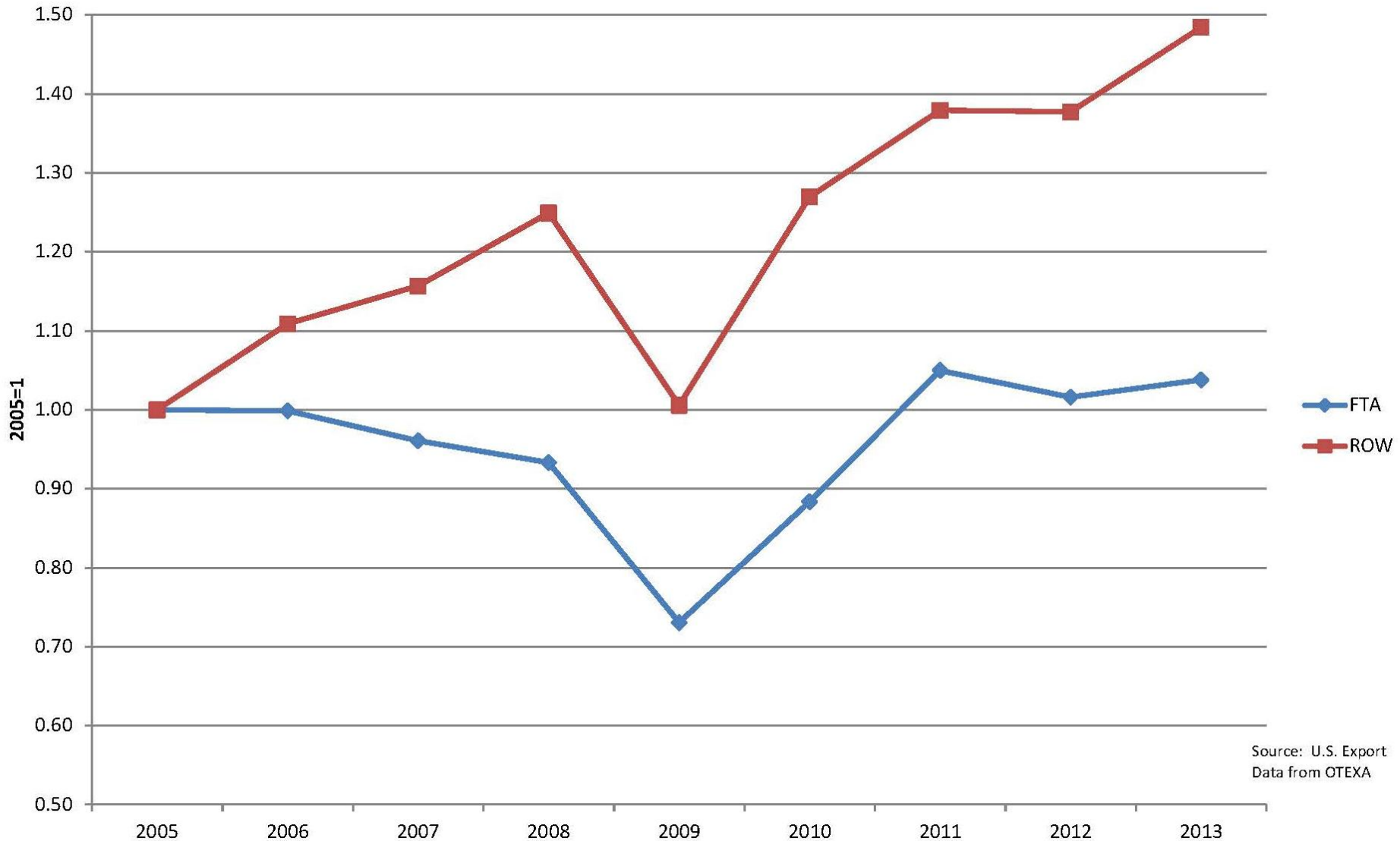
- >> Flexible rules of origin for footwear, textiles, fashion accessories, and apparel
 - Not yarn forward
 - Same proof of origin/customs enforcement for all products

- >> Harmonization and/or mutual recognition of regulatory standards

U.S. Apparel Imports from FTA Countries* Vs. Rest of World (ROW)



Index of U.S. Yarn & Fabric Exports to U.S. Yarn Forward FTAs Vs. Rest of World (ROW)



Source: U.S. Export Data from OTEXA

Regulatory Harmonization/Mutual Recognition

- >> Product Safety
 - *Drawstrings, flammability, testing requirements*

- >> Labeling
 - *Generic names, fur, country of origin, care instructions*

- >> Chemical Management
 - *Reporting, labeling requirements, test methods*

- >> Key Issue: Sub-EU and Sub-federal harmonization

Product Safety

>> Key issue: Testing of Children's Sleepwear (aka the great pyjama vs. pajama debate)

- U.S. CPSC declares pajamas as childcare article – phthalate testing and certification required
- EU does NOT consider sleepwear as childcare article – does not facilitate sleep (sucking or mouthing)
- Recommendation: harmonized definition of childcare article to EU standard

Labeling

>> Key issue: ISO vs ASTM Standards

- Generic fiber names – FTC now allows 2010 ISO standard, EU uses 2013 standard
 - Recommendation: Implement 2013 standard in TTIP, agree to mutual recognition of new names going forward
- Care Symbols – U.S. uses ASTM, EU uses ISO (Ginetex)
 - Both have pros and cons
 - Recommendation: Mutual recognition of both standards

Chemical Management

>> Key issue: Chemicals regulated at different levels; See: AAFA RSL (<https://www.wewear.org/industry-resources/restricted-substances-list/>)

>> Key issue: Sub-federal chemical regulation in U.S.; individual country regulations in EU

- Recommendation: Harmonized approach to chemical prioritization going forward, mutual recognition of testing methods, chemical management at the federal level for U.S. and EU level

Thank You

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