

**Hearing on Proposed Action in the Section 301 Investigations of Acts, Policies,
and Practices of Various Economies Related to the Failure to Impose and
Effectively Enforce a Prohibition on the Importation of Goods Produced with
Forced Labor**

Oral Testimony of Ed Brzytwa

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Thank you for the opportunity to testify today. I'm Ed Brzytwa, Vice President of International Trade at the Consumer Technology Association.

As North America's largest technology trade association, CTA is the tech sector. Our members are the world's leading innovators – from startups to global brands – supporting more than 17 million American jobs. CTA owns and produces CES – the most powerful tech event in the world.

CTA and our members condemn the use of forced labor and support effective, enforceable U.S. policies to address root causes and eradicate forced labor from global supply chains. This is a moral imperative and essential to maintain fair markets, protect workers, and sustain trust in global commerce.

The question is not whether to combat forced labor, but how to do so most effectively. CTA believes that tariffs are not an effective tool to eradicate forced labor from global supply chains. While tariffs can influence trade flows, they do not directly address the underlying conditions that allow for forced labor. Broad tariff measures may even increase economic pressure on suppliers, creating incentives that can worsen labor conditions rather than improve them.

Our written comments offer several recommendations on the proposed actions. Today I would like to highlight five.

First, USTR should more clearly explain how the practices identified in the Report burden or restrict U.S. commerce. Countries have different legal frameworks, enforcement capabilities, and records of addressing forced labor. By grouping together economies with vastly different records, the Report may understate the conduct of the most egregious offenders while failing to recognize meaningful efforts by other governments to strengthen enforcement.

Second, USTR should adopt more transparent and outcome-based measures of enforcement. The Report relies heavily on import detention statistics and inspection volumes. These figures tell only part of the story. Over time, successful enforcement should lead to fewer goods produced with forced labor in our supply chains, not

necessarily more detentions. USTR should instead evaluate measurable outcomes, including improvements in labor protections, supply chain transparency, remediation efforts, and verifiable reductions in forced labor. It should also establish clear benchmarks so trading partners understand how progress will be evaluated and tied to reduced tariff rates.

Third, the United States can and should lead globally on this issue, with USTR at the helm. Lasting progress requires international cooperation, technical assistance, and coordinated enforcement. USTR should work through the ILO and other multilateral forums to develop common standards, improve information sharing among customs authorities, strengthen enforcement capacity, and promote best practices for supply chain due diligence. To be a global leader, USTR should convene the economies in this investigation to develop a coordinated coalition, drawing on frameworks such as the 2026 Critical Minerals Ministerial and the Pax Silica initiative. These efforts will address the root causes of forced labor more effectively than broad tariff measures.

If the Administration does choose to impose tariffs, CTA encourages USTR to maintain and expand the product exclusions in Annex A for consumer technology products. Additional tariffs on many of these products would increase costs for U.S. manufacturers and consumers while doing little to reduce forced labor risks or the incidence of forced labor in the stream of commerce. Enforcement should remain targeted, evidence-based, and focused on the highest-risk products and supply chains.

Finally, we urge USTR to uphold its transparency obligations under the Section 301 statute and the Administrative Procedure Act. If USTR decides to raise tariff rates under the forced labor action, using modification authority under Section 307 of the Trade Act of 1974, it should offer a detailed public report explaining why it is modifying tariff actions. USTR should also subject any proposed modifications – both on scope and rates – to notice and comment, giving stakeholders at least 30 days to provide feedback and appear at a public hearing. Given the significant economic consequences of tariff modifications, adhering to these procedural safeguards ensures that future actions are well-supported and informed by stakeholder input.

CTA appreciates USTR's willingness to engage stakeholders throughout this investigation. We share the Administration's goal of eliminating forced labor from global supply chains, and we believe that objective is best achieved through transparent analysis, targeted enforcement, international cooperation, and policies that strengthen the competitiveness of American businesses.

Thank you for the opportunity to testify, and I look forward to your questions.