1919 S. Eads St.
Arlington, VA 22202
703-907-7600
CTA.tech

July 6, 2026

Ambassador Jamieson Greer
United States Trade Representative
Office of the U.S. Trade Representative
600 17th St. NW
Washington DC, 20508

Re: Notice of Determinations and Request for Comments Concerning Actions in 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 (Docket ID: USTR-2026-0265, USTR-2026-0266)

Dear Ambassador Greer:

The Consumer Technology Association (CTA) appreciates the opportunity to respond to the Office of the U.S. Trade Representative (USTR) on its determinations and proposed actions in the investigation related to the acts, policies, and practices of certain economies related to the failure to impose and effectively enforce a prohibition on the importation of goods produced with forced labor.

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 18 million American jobs. CTA owns and produces CES – the most powerful tech event in the world.

As explained in our previous comments related to this investigation, CTA supports aggressive efforts to eradicate forced labor, and we believe those efforts should focus on effective enforcement, international cooperation, and supply chain transparency rather than broad tariff measures that increase costs for American businesses and consumers.[1] In June 2024, CTA published a paper examining the impact of the Uyghur Forced Labor Prevention Act (UFLPA) on the consumer technology industry.[2] That paper presented survey findings on how U.S.-based technology manufacturers maintain

[1] CTA Submission on Docket USTR-2026-0133, https://www.cta.tech/media/h5ubltlu/cta-comments-to-ustr-on-forced-labor-sec-301-investigation.pdf.
[2] CTA, *Uyghur Forced Labor Prevention Act's Consumer Tech Industry Impact* (May 2024), https://www.cta.tech/research/uyghur-forced-labor-prevention-act-s-consumer-tech-industry-impact/.

compliance with UFLPA. CTA also submitted comments on this issue in 2022 during USTR's request for input to shape its trade strategy to combat forced labor.[3]

In these comments, as in our prior submissions, CTA urges USTR to adopt a transparent, collaborative approach that emphasizes multilateral engagement with trading partners to address the root causes of forced labor rather than relying primarily on tariffs. USTR should develop policies that combat forced labor but do not inadvertently undermine the competitiveness of U.S. manufacturers or make it more difficult for American companies to compete globally.

To that end, CTA recommends that USTR (1) expand Annex A to include additional consumer tech products while retaining all HS codes currently covered by Annex A; and (2) address certain shortcomings in its Report on the Section 301 Investigations of the 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 Important (Report).

1. USTR Should Expand Annex A to Include Additional Consumer Tech Products

CTA members have identified additional HS codes in **Appendix I** that warrant inclusion in Annex A of the Federal Register Notice. These HS codes should be excluded from the proposed actions because (1) there is no domestic manufacturing capacity for these products, or (2) imposing additional duties on these products would substantially increase costs for U.S. businesses and consumers, thereby undermining U.S. innovation and competitiveness while providing little corresponding benefit to efforts to combat forced labor. Many of these HS codes are included in CTA's "Exclusions from the Reciprocal Tariffs and Future Section 232 Tariffs" whitepaper.[4]

In addition, CTA recommends that USTR exclude used goods from any final action resulting from this investigation. Used products are typically resold years after their original manufacture and therefore are not the primary source of current forced labor concerns in production supply chains. Unlike newly manufactured products, imports of used goods generally do not influence current production decisions, labor practices, or sourcing behavior. As a practical implementation mechanism, USTR could establish a dedicated Chapter 99 HS provision for used goods and exempt those entries from any Section 301 duties imposed as a result of this investigation. Such an approach would create a clear distinction between low-risk products and the import flows that the investigation is intended to address. A tailored framework could include a definition of

---

[3] CTA Submission Concerning Trade Strategy to Combat Forced Labor, https://www.regulations.gov/comment/USTR-2022-0006-0039.

[4] CTA, *Exclusions from the Reciprocal Tariffs and Future Section 232 Tariffs* (May 2025), https://www.cta.tech/media/sjmly1vf/cta_reciprocaltariffspaper56.pdf.

used goods and preserve U.S. Customs and Border Protection's (CBP) authority to investigate fraud, evasion, or misclassification.

As well, USTR should recognize companies that have demonstrated strong supply chain due diligence through CBP's trusted trader programs. Participants in CBP's Customs Trade Partnership Against Terrorism (CTPAT) Tier 3 and Trade Compliance programs maintain CBP-validated systems to identify and mitigate forced labor risks, directly advancing the objectives of this investigation. Rather than imposing additional tariffs on these trusted importers, USTR should consider providing tariff relief or other recognition through existing CBP trusted trader programs. Doing so would reward demonstrated compliance, encourage broader adoption of best practices, and allow enforcement efforts to focus on higher-risk supply chains.

Lastly, CTA supports retaining existing Annex A exclusions, including HS codes relevant to the consumer technology industry. Although some stakeholders may advocate for including these products within the scope of the proposed action, CTA supports maintaining their exclusion because doing so will minimize unnecessary disruption to U.S. supply chains while preserving the effectiveness of USTR's targeted enforcement efforts. The relevant HS codes and the rationale for retaining them in Annex A are provided in **Appendix II** of these comments.

2. USTR Should Embody U.S. Global Leadership to Combat Forced Labor.

CTA highlights USTR's proposal to "consider comments" such as to engage in multilateral negotiations, including through the International Labour Organization (ILO), to encourage economies to adopt and effectively enforce prohibitions on imports produced with forced labor. CTA also supports USTR's consideration to provide capacity building and technical assistance, particularly to developing economies that may lack the resources or institutional capabilities necessary to implement and enforce such measures.

USTR should ensure that these commitments remain a central component of its strategy. Long-term progress in combating forced labor will require more than the imposition of tariffs. It requires collective action across a coalition of the willing. Many economies face practical challenges in developing enforcement frameworks, collecting and publishing reliable data, training customs officials, and conducting supply-chain investigations. Multilateral cooperation, technical assistance, and information sharing can help address these challenges and promote more effective and durable reforms. If the U.S. government truly believes it is right to combat forced labor, it should be leading a global effort. Imposing tariffs on imports from countries that do not have or enforce forced labor importation bans does not constitute sufficient global leadership.

Accordingly, USTR should prioritize engagement through the ILO and other multilateral forums, expand opportunities for technical assistance and capacity building, and regularly report on the progress of these efforts. Such initiatives are more likely to address the root causes of forced labor and strengthen global enforcement than tariffs alone. USTR can assume a global leadership role by spearheading the development of common standards for forced labor import prohibitions, promoting greater transparency and data sharing among customs authorities, and drawing on existing private-sector initiatives and programs to develop best practices for supply-chain due diligence.

3. USTR Should Establish a Direct Nexus Between the Identified Practices and U.S. Commerce

The United States has long recognized the importance of combating these abuses, including through signing of the Uyghur Human Rights Policy Act from the first Trump administration and other efforts to strengthen enforcement against goods produced with forced labor. Yet, the Report does not adequately explain how a government's failure to impose or effectively enforce a prohibition on imports produced with forced labor constitutes an unreasonable or discriminatory act, policy, or practice that burdens or restricts U.S. commerce within the meaning of Section 301.

As CTA explained in its prior comments, the relevant question for U.S. commerce is whether goods produced with forced labor enter the U.S. market, not whether such goods enter foreign markets. The Report does not clearly explain how a foreign government's failure to impose or enforce an import prohibition on goods produced with forced labor directly harms U.S. commerce. Moreover, even where forced labor concerns exist, broad tariff actions are unlikely to address the underlying causes of forced labor or encourage meaningful reforms.

The Report appears to assume that imports sourced from economies other than the United States present a heightened risk of forced labor. However, an economy's decision to import goods from both the United States and other economies does not, standing alone, constitute an unreasonable or discriminatory act, policy, or practice. Nor should imports from non-U.S. sources be presumed to involve forced labor absent evidence specific to the product, sector, supply chain, or country at issue. While forced labor risks may be elevated in certain industries, regions, or jurisdictions, those risks are not uniform across all products or trading partners. By relying on broad generalizations, the Report risks treating diverse economies, sectors, and supply chains as presenting equivalent levels of concern without adequately accounting for important differences in risk, enforcement, and compliance.

In addition, the Report does not address whether Section 301 authorizes the collective treatment of dozens of economies under a single theory of unreasonable conduct. The statute refers to the "acts, policies, and practices of a foreign country" in the singular.

While USTR may determine that multiple economies engage in similar conduct, the Report does not explain why the circumstances, legal frameworks, enforcement efforts, and trade effects associated with each economy should be evaluated collectively rather than on an economy-specific basis. USTR should therefore provide a more detailed explanation of how the statutory requirements are satisfied with respect to each economy under investigation.

4. USTR Should Adopt Outcome-based Metrics and a More Nuanced Assessment of Forced Labor Enforcement Efforts

The Report contains several conclusions that would benefit from additional clarification and analysis. A credible investigation by USTR depends on accurate and thorough analysis. Given the significant economic consequences of the proposed actions, USTR's analysis should be rigorous, transparent, and supported by clear evidence. Flawed metrics, including those used in the report resulting from the investigation, may ignore or mischaracterize policies or private actions by companies that effectively combat forced labor and prevent trade in goods produced with forced labor.

For example, while import detentions based on credible indications of forced labor remain an important enforcement tool, the dollar value of detained shipments is not necessarily the best measure of policy effectiveness. USTR should also consider outcome-based metrics that examine how measures address the root causes of forced labor, such as the number of workers removed from forced labor conditions, improvements in labor protections, and demonstrable reductions in forced labor practices. Forced labor importation bans, while helpful, may never eliminate the scourge of forced labor from our planet unless paired with collective action among like-minded economies, sustained engagement by companies committed to preventing forced labor from entering their supply chains, and a universal commitment to ending forced labor in fact rather than in print.

In addition, the Report's broad conclusion that all 60 economies have failed to adequately address imports produced with forced labor obscures important differences among countries' legal frameworks, enforcement efforts, and progress. 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. A more thorough and nuanced assessment would better reflect the realities of forced labor enforcement and help focus resources on the actors and jurisdictions most responsible for these abuses. USTR’s analysis is incomplete without examining the measures that governments take to address the root causes of forced labor (or conversely the measures that some governments may take to promote the use of forced labor).

Absent clear criteria, transparent benchmarks, and a predictable process for evaluating progress, the proposed actions will discourage reform, disrupt established trading relationships and reduce opportunities for U.S. exports.

5. USTR Should Provide More Transparency in the Selection of HS Codes Identified as High Risk of Forced Labor.

Appendix B of the Report identifies 33 HS codes within the electronics sector that are at risk of being made with forced labor inputs. However, the Report does not explain the methodology USTR used to determine that imports classified under these tariff lines are associated with forced labor risks when sourced from the economies under review. USTR should provide greater transparency regarding the criteria, evidence, and country-specific analysis used to select these HS codes.

CTA's review of the Dashboard on UFLPA Enforcement Statistics raises questions regarding the basis for several of these selections.[5] 15 of the electronics HS codes identified in Appendix B have not been “stopped” for potential UFLPA violation by CBP. This inconsistency makes it difficult for stakeholders to understand the basis for the Report's conclusions and detract from the credibility and rigor of USTR’s analysis.

At the same time, USTR should not treat detention data alone as conclusive evidence of forced labor risk. A “stopped” shipment reflects the initiation of a review process rather than a final determination that the detained goods have a nexus with forced labor. In fact, CBP released roughly 80 percent of “stopped” shipments in the electronics sector after importers provided additional information. Accordingly, neither the presence nor absence of detentions fully explains why USTR included these HS codes in Appendix B.

USTR should clearly identify the evidence supporting the inclusion of each HS code, including the specific countries, industries, or supply chains that gave rise to the determination. Greater transparency would improve the credibility of the Report, enable stakeholders to provide more informed feedback, and help ensure that enforcement efforts target the highest-risk goods and supply chains. Broad assertions unsupported by publicly available evidence risk creating uncertainty for legitimate trade without materially advancing efforts to eliminate forced labor from global supply chains.

6. USTR Should Not Rely on Detention Data as an Indicator of Effective Enforcement of a Forced Labor Import Ban

In Section III.B of the Report, USTR appears to treat low levels of import interceptions and prohibitions as evidence that an economy has failed to effectively enforce a prohibition on goods produced with forced labor. For example, Section III.B.1 notes that

[5] CBP, Uyghur Forced Labor Prevention Act Enforcement Statistics, https://www.cbp.gov/newsroom/stats/trade/uyghur-forced-labor-prevention-act-statistics.

Canadian authorities intercepted only 50 shipments suspected of involving forced labor and ultimately prohibited entry to two shipments, while CBP examined 41,857 shipments under the UFLPA and denied entry to 22,879 shipments.

However, raw inspection, detention, and seizure figures do not, by themselves, demonstrate whether an economy is effectively enforcing a forced labor import ban. Economies differ significantly in the size of their markets, import volumes, supply-chain exposure, legal authorities, enforcement resources, and the maturity of their compliance programs. As a result, comparing detention totals across jurisdictions may provide an incomplete or misleading picture of enforcement effectiveness.

Moreover, if USTR treats high detention volumes as the primary indicator of effective enforcement, economies may be unable to demonstrate compliance for months or years after implementing a ban. An effective enforcement regime should ultimately reduce the number of goods produced with forced labor entering supply chains. Over time, successful compliance efforts, supply-chain due diligence, and deterrence measures could reasonably lead to fewer detentions, not more. Under USTR's approach, however, lower detention figures may be interpreted as evidence of weak enforcement rather than evidence of improved compliance.

The Report does not identify a credible benchmark, threshold, or objective standard for determining when an economy has "effectively enforced" a forced labor import prohibition. Instead, on page 26, the Report cites a publication by a single independent researcher that was published only recently, without explaining why that framework was selected over more established criteria from international law or multilateral institutions.[6] USTR should therefore use credible metrics to evaluate enforcement and incorporate outcome-based measures, such as demonstrable reductions in forced labor practices, improvements in supply-chain transparency, remediation of labor abuses, and other indicators that directly measure progress toward eliminating forced labor from global commerce.

7. USTR Should Consider Alternative Explanations for Changes in Trade Flows Before Concluding Forced Labor Practices as the Primary Cause

Several case studies in the Report attribute changes in trade flows and reductions in U.S. exports primarily to forced labor-related practices without adequately considering other potential causes. As a result, the Report may overstate the extent to which alleged failures to prohibit imports produced with forced labor burden or restrict U.S. commerce.

---

[6] Laura Murphy*, An International Blueprint for Forced Labor Import Bans*, Carr-Ryan Center for Human Rights, Harvard Kennedy School (Apr. 2026), https://www.hks.harvard.edu/sites/default/files/2026-05/26_Laura_Murphy_01.pdf.

For example, in Section V.A.3, USTR cites an increase in tobacco exports from Malawi to Poland as evidence that forced labor in other countries contributed to declining U.S. tobacco exports to Poland. However, the Report does not account for broader market developments that may have influenced that trade pattern shift. U.S. tobacco production declined substantially between 2015 and 2025, falling by approximately 50 percent during the same period in which USTR notes that U.S. tobacco exports to Poland declined by 25 percent.[7] Relatedly, U.S. tobacco consumption fell to an 80-year low in 2024, contributing to decreased production. In addition, several U.S. states have implemented programs for more than two decades to assist tobacco farmers in transitioning to alternative agricultural products, such as the Maryland Tobacco Buyout program.[8] These domestic trends likely affected the availability of U.S. tobacco for export. The Report also does not consider the 2023 partnership agreement between the European Union and the Organization of African, Caribbean, and Pacific States (OACPS), which included provisions designed to facilitate agricultural trade and may have contributed to increased imports from Malawi. Further, the proportion of traditional cigarette smokers in Poland decreased from 30 percent to 26 percent in the years 2010-2019.[9]

Taken together, these factors suggest that the decline in U.S. tobacco exports may be attributable to a range of market, policy, and production dynamics unrelated to forced labor. Indeed, U.S. policy has long sought to reduce tobacco production and consumption through public health initiatives and trade actions.[10] Against that backdrop, the Report does not sufficiently explain why forced labor-related practices should be viewed as the primary cause of the observed changes in tobacco trade flows.

Similarly, in Section V.B.1, USTR suggests that Chinese solar manufacturers shifted production to Vietnam, Laos, and Thailand to avoid forced labor-related import prohibitions. However, the record developed during U.S. trade remedy proceedings indicates that the avoidance of antidumping and countervailing duty (AD/CVD) measures was the principal driver of production shifts within the region.[11] By attributing

---

[7] U.S. Department of Agriculture, *Crop Production Historical Track Records*, Tobacco Area Harvested, Yield, Production, Price, and Value – United States: 1866-2025, p. 300 (2026), https://esmis.nal.usda.gov/sites/default/release-files/795853/croptr26.pdf.

[8] Southern Maryland Agricultural Development Commission, *SMADC History*, https://smadc.com/about/smadc-history/.

[9] Dagmara Opoczyńska-Świeżewska et al., *Reduction in the Prevalence of Tobacco Use Accompanying Legislative Changes in Tobacco Policy in Poland in the Years 2010-2019* (2022), https://pmc.ncbi.nlm.nih.gov/articles/PMC10464804/.

[10] Exec. Order No. 13,193, *Federal Leadership on Global Tobacco Control and Prevention*, 66 Fed. Reg. 7,387 (Jan. 23, 2001), https://www.federalregister.gov/documents/2001/01/23/01-2139/federal-leadership-on-global-tobacco-control-and-prevention.

[11] *Final Affirmative Determinations in the Antidumping and Countervailing Duty Investigations of Crystalline Photovoltaic Cells Whether or Not Assembled into Modules from Cambodia, Malaysia, Thailand, and the Socialist Republic of Vietnam*, Dep't of Commerce (Apr. 21, 2025),

these investment and sourcing decisions primarily to forced labor-related measures, the Report overlooks alternative explanations that prior U.S. government investigation have extensively documented.

These examples illustrate the need for a more rigorous causation analysis. Before concluding that a foreign economy's actions related to forced labor burden or restrict U.S. commerce, USTR should evaluate and account for other significant factors that may explain changes in trade flows, sourcing decisions, investment patterns, and export performance. A more comprehensive analysis would strengthen the credibility of the Report and help ensure that a clear understanding of the underlying causes of the alleged harm serves as the basis for any resulting policy actions.

8. USTR Should Continue to Recognize Good-Faith Efforts to Combat Forced Labor

CTA appreciates that USTR distinguishes among economies based on their efforts to combat forced labor in supply chains. Specifically, USTR recognizes economies that have taken meaningful steps to address forced labor through measures such as adopting import prohibitions, undertaking commitments under Agreements on Reciprocal Trade (ART), or implementing partial enforcement regimes. This proposed approach appropriately acknowledges that economies are at different stages of developing and implementing forced labor enforcement frameworks.

CTA supports USTR's decision to recognize these good-faith efforts and encourages USTR to continue evaluating economies based on concrete actions and demonstrated progress. Such an approach creates incentives for additional reforms and promotes the broader adoption of effective measures to eliminate forced labor from global supply chains.

9. USTR Should Create a Transparent Pathway for Tariff Rate Decreases

While CTA appreciates USTR's recognition of economies that are making meaningful progress in combating forced labor, the proposed actions do not provide a clear framework for reducing tariff rates as those economies continue to improve their enforcement efforts. Nor does the Report recognize that economies face different legal, economic, and institutional circumstances and therefore may require different approaches to achieving compliance. Moreover, the Report appears to rely on a single recently published framework to assess enforcement efforts without explaining why that framework should serve as the primary basis for evaluating economies with widely

---

https://www.trade.gov/final-affirmative-determinations-antidumping-and-countervailing-duty-investigations-crystalline.

varying circumstances.[12] USTR should instead employ a flexible and transparent methodology that draws upon established international standards, objective indicators, and evidence of measurable progress in combating forced labor.

Before implementing the proposed actions, USTR should establish transparent criteria and timelines under which economies may qualify for reduced tariff rates. For example, USTR could conduct periodic reviews every six months or annually to evaluate progress and determine whether tariff rates should be adjusted. USTR should also identify a range of actions that may warrant consideration for tariff relief, including adopting and enforcing import prohibitions on goods produced with forced labor, undertaking commitments through ARTs, improving the collection and publication of enforcement data, increasing supply-chain transparency, and participating in multilateral initiatives and negotiations, including through the ILO.

Providing a clear pathway for tariff reduction would create incentives for continued reform, reward measurable progress, and better align the proposed actions with the ultimate objective of eliminating forced labor from global supply chains.

Conclusion

CTA remains committed to working with USTR, Congress, industry, and international partners to eliminate forced labor from global supply chains. Effective solutions should target bad actors, strengthen enforcement, promote international cooperation, and avoid unnecessary costs on American businesses and consumers. We appreciate the opportunity to provide these comments and look forward to continued engagement.

Sincerely,

Ed Brzytwa
Vice President of International Trade
Consumer Technology Association

Michael Petricone
Senior Vice President of Government Affairs
Consumer Technology Association

[12] Laura Murphy, *An International Blueprint for Forced Labor Import Bans*, Carr-Ryan Center for Human Rights, Harvard Kennedy School (Apr. 2026), https://www.hks.harvard.edu/sites/default/files/2026-05/26_Laura_Murphy_01.pdf.

Appendix I

HTSUS	Description	Rationale for inclusion
3215	Inks	Imposing additional tariffs would raise costs for U.S. businesses, schools, and government agencies that depend on these consumables without meaningfully reducing forced labor risks, as the manufacturing technology and raw material supply chains are globally integrated
3402.90.50	Cleaning preparations used in semiconductor processing	Domestic manufacturing capacity does not exist
3917.40.00	Fittings of fluoropolymers used in semiconductor equipment	Domestic manufacturing capacity does not exist
3919.10.10	Self-adhesive plates, sheets, other flat shapes, of plastics, in rolls n/o 20 cm wide, light-reflecting surface produced by glass grains	Domestic manufacturing capacity does not exist
3919.10.20	Carrier tape for (semiconductor) dies	Domestic manufacturing capacity does not exist
3919.90.50	Game controller skin overlays for personalization; Circular polishing pads of a kind used for the manufacture of semiconductor wafers	Domestic manufacturing capacity does not exist
4202	Cases, backpacks, sleeves	Additional tariffs would increase costs for U.S. consumers and small businesses. These are low-margin accessory products for which the price sensitivity of end users makes tariff pass-through economically harmful, particularly to educational and public sector purchasers.
7020.00.60	High grade fused silica or fused quartz nozzles and quartz rings designed for semiconductor manufacturing equipment; Quartz items of a kind used for the production or processing of semiconductor boules or wafers, semiconductor devices, electronic integrated circuits, or flat panel displays	Domestic manufacturing capacity does not exist
8301.40.60	Smart locks (8301406030), electronic door locks	Domestic manufacturing capacity does not exist
8415	Air Conditioners	Domestic manufacturing capacity does not exist
8418	Refrigerators and freezers	Domestic manufacturing capacity does not exist
8419	Clothes Dryers	Domestic manufacturing capacity does not exist
8421	Air/water filtering	Domestic manufacturing capacity does not exist
8422	Dishwashers	Domestic manufacturing capacity does not exist
8423	Scales	Domestic manufacturing capacity does not exist
8424	Sprinklers	Domestic manufacturing capacity does not exist
8428.90.02	Industrial robots for lifting, handling, loading or unloading, nesoi; Other machines for lifting, handling, loading or unloading printed circuits or substrates for the manufacture	Domestic manufacturing capacity does not exist

HTSUS	Description	Rationale for inclusion
	of printed circuit or printed circuit assemblies	
8433	Robotic lawnmowers	Domestic manufacturing capacity does not exist
8443.31	Printers, printer cartridges, photocopiers, scanners	Additional tariffs would impose severe cost burdens on U.S. businesses, healthcare providers, and government agencies that rely on printer technology for daily operations. The imposition of duties on printers would also harm U.S.-based companies, which employ tens of thousands of American workers in R&D, sales, service, and support.
8443.32	Printers, printer cartridges, photocopiers, scanners	Additional tariffs would impose severe cost burdens on U.S. businesses, healthcare providers, and government agencies that rely on printer technology for daily operations. The imposition of duties on printers would also harm U.S.-based companies, which employ tens of thousands of American workers in R&D, sales, service, and support.
8443.39	Printers, printer cartridges, photocopiers, scanners	Domestic manufacturing capacity does not exist
8450	Washing machines	Domestic manufacturing capacity does not exist
8451	Clothes Dryers	Domestic manufacturing capacity does not exist
8479.50.00	Industrial robots for lifting, handling, loading or unloading, nesoi; Other machines for lifting, handling, loading or unloading printed circuits or substrates for the manufacture of printed circuit or printed circuit assemblies	Domestic manufacturing capacity does not exist
8479.89.83	Machines for the manufacture of optical media	Domestic manufacturing capacity does not exist
8479.89.92	Machinery for electronics manufacturing/PCBA manufacturing	Domestic manufacturing capacity does not exist
8481.80.50	Hand operated valves, other than copper, iron, or steel type, of a kind used for the production or processing of semiconductor boules or wafers, semiconductor devices, electronic integrated circuits, or flat panel displays	Domestic manufacturing capacity does not exist
8481.80.90	Valves, other than hand-operated, of a kind used for the production or processing of semiconductor boules or wafers, semiconductor devices, electronic integrated circuits, or flat panel displays	Domestic manufacturing capacity does not exist
8485	3D printers/parts and additive manufacturing machines	The United States is a global leader in additive manufacturing innovation, and U.S. companies depend on competitively priced 3D printing equipment to maintain that leadership. Additional

HTSUS	Description	Rationale for inclusion
		tariffs would increase costs for U.S. manufacturers, aerospace companies, medical device makers, and research institutions that use 3D printing as a core production and prototyping technology, thereby undermining American industrial competitiveness without addressing forced labor at the source.
8504.40	Chargers and Power Adapters	These components are essential inputs for virtually all electronic devices, and there is no meaningful domestic manufacturing alternative. Additional tariffs would cascade across the entire electronics industry, raising costs for U.S. manufacturers of computers, medical equipment, and communications infrastructure. The downstream harm to U.S. industry and consumers would far outweigh any benefit, particularly given that forced labor compliance can be addressed through supply chain due diligence requirements more effectively than through broad tariff measures.
8505.11.00	Neodymium magnets used in loudspeakers	Domestic manufacturing capacity does not exist
8506	Batteries: EV batteries, lithium, leadacid, etc.	Domestic manufacturing capacity does not exist
8507	Batteries: EV batteries, lithium, leadacid, etc.	Domestic manufacturing capacity does not exist
8508	Vacuum cleaners	Domestic manufacturing capacity does not exist
8516.50	Microwave ovens	Domestic manufacturing capacity does not exist
8516.60	Electric cooking stoves, ranges and ovens	Domestic manufacturing capacity does not exist
8516.79.00	Wearable sensor patch	Domestic manufacturing capacity does not exist
8517.11.00	Landline Telephones	Domestic manufacturing capacity does not exist
8517.18.00	Telephone handsets	U.S. enterprises and government agencies rely on these devices for mission-critical communications infrastructure. Tariff-driven price increases would force agencies and businesses to delay technology refreshes, reducing productivity and security. There are no domestic alternatives capable of meeting the scale of U.S. demand, and the imposition of duties would primarily burden American end users rather than deter forced labor practices at the manufacturing level.
8517.14.00	Medical Alert Device, Personal Emergency Response System (PERS), cellular	Domestic manufacturing capacity does not exist
8517.69	Video bars, video conferencing cameras and video conferencing systems	These products have become essential infrastructure for the U.S. hybrid and remote workforce. Additional tariffs would increase costs for businesses, educational institutions, and government agencies that depend on these systems, reducing investment in collaboration technology at a time when such investment is critical to U.S. productivity. No domestic manufacturing base exists to replace imported supply, making tariffs an ineffective and

HTSUS	Description	Rationale for inclusion
		economically harmful policy instrument for this product category.
8518.10	Microphones	These components are integral to a wide range of U.S. communication, healthcare, and enterprise applications, and there is no domestic supply capable of meeting market demand. Additional tariffs would raise input costs for U.S. manufacturers of communication devices, hearing health products, and professional audio equipment, harming American industry while providing no practical mechanism to address forced labor concerns in upstream manufacturing.
8518.21	Finished speakers, portable Bluetooth speakers	Excluding this HTS code would strengthen the competitiveness of U.S. companies and retailers, support American jobs across retail, logistics, and distribution, and help U.S. brands compete more effectively against low-cost direct-to-consumer imports from China.
8518.22	Finished speakers, portable Bluetooth speakers	Excluding this HTS code would strengthen the competitiveness of U.S. companies and retailers, support American jobs across retail, logistics, and distribution, and help U.S. brands compete more effectively against low-cost direct-to-consumer imports from China.
8518.29	Unmounted/unenclosed speakers	Excluding this HTS code would strengthen the competitiveness of U.S. companies and retailers, support American jobs across retail, logistics, and distribution, and help U.S. brands compete more effectively against low-cost direct-to-consumer imports from China.
8518.30	Headsets	These devices are essential tools for the U.S. remote workforce, contact center industry, and enterprise communications. Tariff-induced price increases would disproportionately harm small businesses and individual workers who rely on headsets for daily productivity. Domestic manufacturing alternatives do not exist at scale, meaning additional duties would function purely as a tax on U.S. businesses and consumers, with no corresponding shift in production away from regions of concern.
8518.40	Audio amplifiers	Excluding this HTS code would strengthen the competitiveness of U.S. companies and retailers, support American jobs across retail, logistics, and distribution, and help U.S. brands compete more effectively against low-cost direct-to-consumer imports from China.
8518.50	Audio amplifiers	Domestic manufacturing capacity does not exist
8518.90	Parts of microphones	Excluding this HTS code would strengthen the competitiveness of U.S. companies and retailers, support American jobs across retail, logistics, and distribution, and help U.S. brands compete more effectively against low-cost direct-to-consumer imports from China.

HTSUS	Description	Rationale for inclusion
8519.81.30	Soundbars	Excluding this HTS code would strengthen the competitiveness of U.S. companies and retailers, support American jobs across retail, logistics, and distribution, and help U.S. brands compete more effectively against low-cost direct-to-consumer imports from China.
8519.30	Turntables	Domestic manufacturing capacity does not exist
8519.89.10	Turntables	Domestic manufacturing capacity does not exist
8525.50.10	Streaming media player, USB stick style, set-top boxes	Domestic manufacturing capacity does not exist
8525.50.30	Streaming media player, USB stick style, set-top boxes	Domestic manufacturing capacity does not exist
8525.80	Home security cameras, smart doorbells, video conference cameras	Domestic manufacturing capacity does not exist
8525.89	Digital cameras/camcorders	Domestic manufacturing capacity does not exist
8526.91.00	Radio navigational aid apparatus, other than radar	Few or no domestic sources exist today for many of these devices. Tariffs would raise the cost of GPS-enabled products for transportation, public safety, fleet operations, emergency response, disaster relief, and infrastructure work
8527	Radios, A/V receivers, audio baby monitors	Excluding this HTS code would strengthen the competitiveness of U.S. companies and retailers, support American jobs across retail, logistics, and distribution, and help U.S. brands compete more effectively against low-cost direct-to-consumer imports from China.
8528.71.00	Reception apparatus for television, not designed to incorporate a video display or screen	Excluding this HTS code would strengthen the competitiveness of U.S. companies and retailers, support American jobs across retail, logistics, and distribution, and help U.S. brands compete more effectively against low-cost direct-to-consumer imports from China.
8531.10.00	Alarm systems, smoke detectors, CO detectors	Domestic manufacturing capacity does not exist
8534.00.00	Antenna Sheet	Essential input for U.S.-based smart card production with limited domestic alternatives
8539.50.00	Smart light bulbs, smart lamps, Light-emitting diode (LED) lamps	Domestic manufacturing capacity does not exist
8541.41.00	LEDs	Domestic manufacturing capacity does not exist
8541.42.00	Photovoltaic cells/solar cells	Domestic manufacturing capacity does not exist
8541.43.00	Photovoltaic cells/solar cells	Domestic manufacturing capacity does not exist
8543.70.87	Gaming controllers and accessories; E-readers	Excluding this HTS code would strengthen the competitiveness of U.S. companies and retailers, support American jobs across retail, logistics, and distribution, and help U.S. brands compete more effectively against low-cost direct-to-consumer imports from China.
8543.70.96	Home automation controllers / interfaces	Domestic manufacturing capacity does not exist
8544.42	Insulated electric conductors/cables with connectors	Excluding this HTS code would strengthen the competitiveness of U.S. companies and retailers, support American jobs across retail, logistics, and

HTSUS	Description	Rationale for inclusion
		distribution, and help U.S. brands compete more effectively against low-cost direct-to-consumer imports from China.
8547.20.00	Insulating jackets or sleeves designed to cover electrical components used in semiconductor manufacturing equipment	Domestic manufacturing capacity does not exist
8711.60.00	E-bicycles	Domestic manufacturing capacity does not exist
8711.90.01	E-Scooter	Domestic manufacturing capacity does not exist
8806.21.00	Drones	Domestic manufacturing capacity does not exist
9018.19.55	Remote patient monitoring equipment, Temperature monitors	Domestic manufacturing capacity does not exist
9018.19.95	Pulse oximeters and other electrodiagnostic medical apparatuses	Domestic manufacturing capacity does not exist
9018.90.50	Blood Pressure Monitor	Domestic manufacturing capacity does not exist
9018.90.80	Spirometer	Domestic manufacturing capacity does not exist
9019.10.20	Massage apparatus, electrically operated, battery powered, handheld	Domestic manufacturing capacity does not exist
9021.40.00	Hearing aids / PSAPs	Domestic manufacturing capacity does not exist
9025.19.80	Meat thermometers/smart thermometers	Domestic manufacturing capacity does not exist
9027.89.45	Blood glucose meter	Domestic manufacturing capacity does not exist
9029.20.40	Pulse oximeters	Domestic manufacturing capacity does not exist
9031.80.80	Fitness trackers (basic pedometers, for the most part)	Domestic manufacturing capacity does not exist
9032.10.00	Thermostats	Domestic manufacturing capacity does not exist
9102.91.20	Watches (excl. wrist watches) nesoi, electrically operated, with optoelectronic display only	Domestic manufacturing capacity does not exist
9405.42	LED Lighting Fixtures	Excluding this HTS code would strengthen the competitiveness of U.S. companies and retailers, support American jobs across retail, logistics, and distribution, and help U.S. brands compete more effectively against low-cost direct-to-consumer imports from China.
9405.99	Parts for lamps and lighting fittings	Excluding this HTS code would strengthen the competitiveness of U.S. companies and retailers, support American jobs across retail, logistics, and distribution, and help U.S. brands compete more effectively against low-cost direct-to-consumer imports from China.
9504.50.00	Video game consoles; Augmented Reality and Virtual Reality Products and Components	Domestic manufacturing capacity does not exist
9506.91.00	Articles and equipment for general physical exercise, gymnastics or athletics	There are no viable domestic alternatives to meet the capacity needs for the industry and are not subject to any of the 55 WROs

Appendix II

HTSUS	Description	Rationale
8471.30.01	Notebooks, Tablets	Additional tariffs could lead to the unavailability of domestic supply of portable computing devices that are critical to business and consumer productivity.
8471.41.01	Desktop personal computers, Touchscreen computers	Additional tariffs would cause serious dislocations in the supply of desktops and all-in-one touchscreen computing systems relied upon by households and businesses.
8471.49.00	Desktop computer systems	Additional tariffs would cause serious dislocations in the supply of desktop computer systems relied upon by households and businesses.
8471.50.01	Desktop personal computers, workstations,	Additional tariffs could lead to the unavailability of domestic supply of desktop computers and workstations that are essential for enterprise and government operations, where no domestic sourcing alternatives currently exist at scale.
8471.60	Keyboards, combination keyboard and Mouse, touchpads, scanners, mice, pens	Additional tariffs would cause serious dislocations in the supply of essential input devices. These products lack meaningful domestic manufacturing alternatives, and tariff-driven supply disruptions would broadly affect businesses and consumers.
8471.70	Storage units	Additional tariffs could lead to the unavailability of domestic supply of storage devices.
8471.80.10	Docking Stations, USB Hubs, Control or adapter units, etc.	Additional tariffs could lead to the unavailability of domestic supply of devices.
8471.30.1140	Memory modules for use with ADP machines	Additional tariffs could lead to the unavailability of domestic supply of memory modules, which are critical components for computing systems.
8473.30.1180	Printed circuit assemblies for computers, Processor Boards, Graphic Cards, MB	Additional tariffs would cause serious dislocations in the supply of critical electronic assemblies and could cause disruptions across the technology sector.
8473.30.51	LCD Display Panels, key caps, hinge-ups, base units, other parts of ADP machines or scanners	Additional tariffs could lead to the unavailability of display panels and precision laptop components.
8486	Machines and apparatus for the manufacture of semiconductor devices or electronic integrated circuits	Domestic manufacturing capacity does not exist
8517.13.00	Smartphones	Domestic manufacturing capacity does not exist
8517.62.00	Network Adapter, Wireless Module, WWAN, WLAN, wireless speakerphones, video bar, VoIP adapters, videoconferencing systems	Additional tariffs could lead to the unavailability of wireless and networking components that are essential for connectivity and enterprise collaboration infrastructure, with no domestic supply alternatives capable of filling the gap.
8523.51.00	Flash memory including SSD	Additional tariffs would cause serious dislocations in the supply of solid state storage media, which is critical to virtually all computing platforms and for which domestic manufacturing alternatives are not available at required volumes.
8524	Flat panel display modules, whether or not incorporating touch-sensitive screens	Additional tariffs would cause serious dislocations in the supply of flat panel display modules.
8528.52.00	PC Monitors	Additional tariffs could lead to the unavailability of domestic supply of monitors, which are essential

HTSUS	Description	Rationale
		tools for workforce productivity and have no viable U.S. manufacturing base to absorb demand shifts caused by tariff restrictions.
8541	Semiconductor devices (e.g., diodes, transistors, semiconductor-based transducers); photosensitive semiconductor devices including photovoltaic cells; light-emitting diodes (LED); mounted piezo-electric crystals; parts thereof	Additional tariffs would cause serious dislocations in the global semiconductor supply chain and could cause economy-wide disruptions to all technology sectors. The U.S. lacks the domestic production infrastructure needed to replace these components at the volumes required by the industry.
8542	Integrated circuits (ICs), microprocessors, etc.	Additional tariffs would cause serious dislocations given that integrated circuit manufacturing is dominated by a small number of highly specialized global foundries, and there are currently no domestic equivalents capable of producing comparable products at the required specifications and scale.
8544	Cables	Cables are already subject to Section 232 tariffs; application of additional Forced Labor 301 tariffs would impose unnecessary cost burdens on downstream U.S. industries.