



**UNITED STATES
ASSOCIATION OF
IMPORTERS OF
TEXTILES AND
APPAREL**

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February 19, 2010

Ms. Marideth Sandler, Executive Director
Generalized System of Preferences Program
Chair, GSP Subcommittee
Office of the U. S. Trade Representative
600 17th Street, N.W.
Washington, D.C. 20508

Re: USTR-2010-0004: Petition to Withdraw the Eligibility of Certain Sleeping Bags Under the GSP Program, 75 Fed. Reg. 4133 (January 26, 2010)

Dear Ms. Sandler:

The U.S. Association of Importers of Textiles and Apparel (USA-ITA) opposes the petition to withdraw the eligibility of certain sleeping bags from the U.S. Generalized System of Preferences program (GSP) because it is premised on the incorrect assumption that sleeping bags are excluded from the GSP program as a matter of law. As explained below, sleeping bags are properly designated as GSP-eligible articles. Therefore, they cannot be withdrawn from the GSP program, except in those instances where the level of trade from a particular country exceeds the competitive need limits. USA-ITA urges the Subcommittee to deny the petition.

USA-ITA is the major trade association of the U.S. apparel and home furnishings importing and retailing community. Established in 1989, USA-ITA represents more than two hundred companies, including apparel manufacturers and brands, distributors, retailers, importers, and related service providers, such as shipping lines and customs brokers. USA-ITA member companies source apparel and other consumer products globally, responding to the demands of the U.S. consumer market for safe, quality products timely delivered at the right price.

Most textile and apparel products currently do not benefit from GSP, due to a statutory limitation imposed concurrent with the start of the international Multifiber Arrangement in 1974. However, with

the end of the quota system on January 1, 2005, and the Congress prepared to conduct a major legislative reform of all unilateral preference programs this year, USA-ITA looks forward to the development of a modern, 21st Century GSP program that treats all consumer goods alike, including textile and apparel products. For that reason, USA-ITA believes it is especially important that the GSP Subcommittee not take a backward step with its consideration of the petition to withdraw the GSP treatment of sleeping bags.

I. Sleeping Bags Are Properly Designated As GSP-Eligible Articles

A. Sleeping Bags Are Not Articles "Subject to Textile Agreements"

USA-ITA strongly disputes the assertion by the Petitioner that because sleeping bags are made with textile components they are necessarily excluded from the GSP program and were erroneously designated as GSP-eligible products in 1992. In fact, the GSP statute excludes only "textile and apparel articles which are subject to textile agreements" as of January 1, 1994.¹ Sleeping bags have never been "subject to textile agreements," a fact that the Petitioner seemingly seeks to obscure by omitting any reference to the one document that definitively identifies all textile and apparel articles that were "subject to textile agreements" to which the United States was a party, the multilaterally negotiated Multifiber Arrangement (MFA) and the Agreement on Textiles and Clothing (ATC).

USA-ITA agrees with the Petitioner (1) that it is not necessary for a textile article to have been subject to a specific restraint (quota) under a bilateral textile agreement in order to be within the scope of the GSP exclusion and (2) that the list of products "subject to textile agreements" and excluded from inclusion in the GSP Program changed – grew -- over time, at least until the GSP law was amended in 1996 to permanently fix the exclusion based upon the products subject to textile agreements on January 1, 1994. However, the legislative history of the GSP statute is clear that an article must have been within the scope of an "international textile agreement" in order to be excluded.

Thus, in the Senate Report that accompanied the Trade Act of 1974, the Senate Finance Committee explained that only the "textile and apparel products subject to international textile agreement

¹ Section 503 of the Trade Act of 1974, as amended by the Small Business Job Protection Act of 1996; Pub. L. 93-618, Section 503(c)(1)(A) and Pub. L. 104-188, Section 1952.

would be excluded . . .” from the GSP program.² The reference to an “international textile agreement” in 1974 clearly means the MFA, which became effective on January 1, 1974.

As part of the Uruguay Round of GATT negotiations, it was agreed, though, that the MFA would be replaced by the ATC, which would gradually end the decades of treating textile and apparel as an exception to normal GATT rules. A ten-year integration schedule was established, to start on January 1, 1995. That should have meant that the statutory exclusion of textile and apparel products from the GSP program also would be gradually eliminated. Instead, the GSP statute was changed to fix in time the scope of excluded textile and apparel products, based upon the product coverage of the international agreement as of January 1, 1994.

The recognized product coverage as of January 1, 1994 was particularly extensive because the parties to the MFA and the ATC had just completed negotiating a list of those products. In order to implement the agreed integration schedule, which required each of the countries imposing (or considering imposing) quotas to identify 16 percent, then 17 percent, and then 18 percent of covered trade (based upon the level of trade in those products in 1990) that would be removed from the quota system during each of three stages, the negotiators had to identify the universe of textile and apparel products that were included at the outset of the integration process.³ Not surprisingly, given the desire of the major developed importing countries, including (if not, particularly,) the United States, to delay for as long as possible liberalizing trade in products actually subject to quotas, the list, which became known as the Annex to the ATC,⁴ was ultimately much more expansive than the quotas actually imposed during the course of the MFA. Many products were included in the Annex that had never been the subject of quotas under the bilateral agreements negotiated by the United States, much less likely to be subject to those quotas. For example, (in)famously, the Annex included items like dolls’ clothing, parachutes, and something called “cat-gut.” But, like the U.S. bilateral textile agreements, what it did not include were sleeping bags, of any type.

² Sen. Rpt. No. 93-1298, at 224, (November 1974).

³ See *The Drafting History of the Agreement on Textiles and Clothing*, Marcelo Raffaelli and Tripti Jenkins (1996). The fourth stage integrated all remaining products.

⁴ Article 1.7 of the ATC states, “The textile and clothing products to which this Agreement applies are set out in the Annex.” The full Annex is attached as an appendix to these comments.

The failure of the Petition to acknowledge the existence of the Annex, much less its significance in providing a definitive identification of which textile and apparel articles were “subject to textile agreements” on January 1, 2004, is highly suspect. Because the Annex to the ATC reflects, by Harmonized Tariff Schedule classification, what all of the countries participating in the MFA and then the ATC, including the United States with its dozens of bilateral textile agreements, considered to be articles “subject to textile agreements,” and it does not include sleeping bags, the GSP program does not exclude sleeping bags from designation, as a matter of law.

B. The President Was Within His Power Designating Sleeping Bags As GSP-Eligible

In light of these facts, the petitioner’s contention that the 1992 proclamation designating HTSUS 9404.30.80 as GSP-eligible was beyond the power of the President is clearly wrong. Because sleeping bags are not “subject to textile agreements,” it was fully within the power of the President to designate sleeping bags, whether containing under 20 percent by weight down and/or feathers or 20 percent or more by weight down and/or feathers, as eligible products under the GSP program. Sleeping bags with 20 percent or more by weight down and/or feathers (HTSUS 9404.30.40) were apparently designated early in the GSP program, while sleeping bags containing less than 20 percent by weight down and/or feathers were properly and legally designated in 1992.

There also is no reason to question the adequacy of the review conducted in 1991 and 1992 to determine whether HTSUS 9404.30.80 should be designated, based upon whether sleeping bags were import-sensitive. That review included a full U.S. International Trade Commission (USITC) review, and the report issued by the USITC indicates that not only was there a public hearing, the USITC staff also collected a substantial amount of information about the U.S. industry producing sleeping bags. The USITC reasonably concluded that there would not be a significant negative economic effect on the U.S. industry if the sleeping bags were designated.⁵

⁵ See USITC Inv. No. TA-131-18 and 503(A)-23 and 332-319, Pub. No. 2491 (March 1992). The report notes that “Industry sources indicate that foreign competition has had little adverse effect on this industry.”

II. That Sleeping Bags Are Subject to Other Laws Affecting Textile Products Is Not Relevant

The Petitioner makes much of the fact that sleeping bags are subject to other laws regulating products with textile components, such as the Textile Fiber Identification Act and the Berry Amendment, trying to suggest that this must mean they cannot be designated as GSP-eligible products. The Petitioner is attempting to ignore – and obscure -- the fact that the plain language of the GSP statute expressly limits the exclusion of textile and apparel products to those textile and apparel products that are “subject to textile agreements.” Neither the Textile Fiber Identification Act nor the Berry Amendment bases its coverage on which products are “subject to textile agreements.” Therefore, those laws have a different scope that is entirely unrelated to an international textile agreement. The petitioner’s reference to those laws is a red herring. Those laws are irrelevant for purposes of identifying which products are eligible for GSP designation.

III. There Is No Basis For the Subcommittee To Consider Import Sensitivity Today

The Petitioner also argues that the GSP designation for sleeping bags should be withdrawn because they are “highly import-sensitive.” However, the import sensitivity of sleeping bags has already been determined. That is what the 1991-1992 review was about. There is nothing under the GSP statute that allows that question, which was properly, legally and fully considered, to be re-litigated today.

It is also bad policy to re-open a previously decided question of whether a product is import-sensitive. To allow such a re-opening of resolved issues would create uncertainty (1) for a program that is intended to help developing countries move up the development (and democracy) ladder, and (2) for U.S. businesses that need to be able plan business many months in advance of the date that goods will actually enter the United States. If duty rates, and pricing assumptions based upon those duty rates, are subject to sudden and repeated changes based upon reversals of earlier determinations regarding import-sensitivity, the viability of the GSP program is at serious risk. After more than 35 years, when the reliability and certainty of the GSP program already has suffered from repeated expirations, that is the wrong direction in which to take the GSP program.

There is only one basis for withdrawing a properly designated product from the GSP program, and that is set out in unambiguous terms in the GSP statute. Once a product has been designated as GSP-

eligible, that designation may only be withdrawn on a country specific basis, based upon a determination that a particular country has become competitive in that product and no longer needs the GSP program's duty-free treatment in order to be successful in the U.S. market. Here, the trade in sleeping bags from Bangladesh, which is the supplier country Petitioner is most concerned about, is no where near the competitive need limits that would provide a basis for withdrawing them from the GSP program. In 2009, U.S. imports of sleeping bags from Bangladesh reached a grand total of only 119,000 units, with a value of \$612,000. Meanwhile, U.S. imports of sleeping bags from China totaled almost 7 million units, with a value of \$64 million. Sleeping bags produced in Bangladesh are clearly a long way from being considered competitive within the context of the GSP program.

IV. Now Is The Time To Expand GSP Product Coverage, Not Step Backwards

It is deeply disappointing to see a Petition filed in 2010 contending that a product should be excluded from the GSP program simply because it contains textile components, essentially proposing a far broader exclusion from the GSP program than has ever actually existed under the GSP statute. We are now more than five years since textile and apparel trade was integrated into normal trading rules under the World Trade Organization, more than four years since Vietnam's textile and apparel trade ceased being restrained and more than one year since the safeguards on China's textile and apparel trade expired. It is time for the Administration, the Congress, and industry to finally recognize that textiles and apparel products are no longer a "special case" to be treated as the exception to every trade liberalization program.

There is no longer any policy justification for excluding any textile and apparel products from the U.S. GSP program. Other major developed countries, particularly the European Union, Canada, Australia and Japan, already include all industrial products in their GSP programs. The United States should now finally follow suit.

This year, the Congress will consider a major overhaul of all of the unilateral preference programs, including the GSP program. There would be significant benefits for both the least developed countries and the United States if it were to apply the GSP program to all products, including textile and apparel products. It would mean that we could have a single program for providing preferential access to the U.S. market, rather than a confusing set of regional programs. The various regional programs

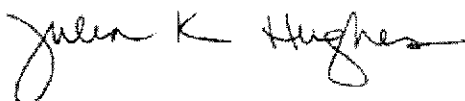
contain different origin rules and different paperwork requirements, as well as different expiration dates. All of that undermines the ability of both less sophisticated and highly experienced companies to ensure that they are complying with the rules and preparing the proper documents, and to do so efficiently.

There are other important benefits to be derived from expanding the GSP program to include the textile and apparel sector. Including textile and apparel products under GSP eligibility brings with it the requirement that beneficiary countries meet the eligibility criteria, including protection of internationally recognized worker rights, adequate and effective protection of intellectual property rights, and elimination of barriers to trade in services and in investment. This is leverage we have not had with many of these countries – and this is an important element in the sourcing decision for U.S. companies. As importers and retailers, we take into serious consideration the working standards and the level of compliance in every country where we do business. The support from the requirements for GSP countries would be a win-win for us all.

Some in the U.S. textile industry have been quoted as saying they want to help the developing world maintain their share of the international production of textile and apparel products now that all quotas are gone. The simplest and most effective way is to support GSP status for our sector. Indeed, including textile and apparel products as eligible articles under the GSP program represents the positive approach to the end of the international quota program, as opposed to the protectionist approach promoted by the Petition to remove sleeping bags from eligibility.

We look forward to working closely with the Administration and the Congress to reform and modernize U.S. preference programs for the 21st Century, to make them a more vibrant part of U.S. trade policy to assist developing countries. A first step in that effort should be denying a Petition that lacks any legal basis and seeks only to turn back the clock.

Sincerely,

A handwritten signature in black ink that reads "Julia K. Hughes". The signature is written in a cursive, flowing style.

Julia K. Hughes
President

Attachment

Appendix

Annex to the Agreement on Textiles and Clothing

ANNEX

LIST OF PRODUCTS COVERED BY THIS AGREEMENT

1. This Annex lists textile and clothing products defined by Harmonized Commodity Description and Coding System (HS) codes at the six-digit level.
2. Actions under the safeguard provisions in Article 6 will be taken with respect to particular textile and clothing products and not on the basis of the HS lines *per se*.
3. Actions under the safeguard provisions in Article 6 of this Agreement shall not apply to:
 - (a) developing country Members' exports of handloom fabrics of the cottage industry, or hand-made cottage industry products made of such handloom fabrics, or traditional folklore handicraft textile and clothing products, provided that such products are properly certified under arrangements established between the Members concerned;
 - (b) historically traded textile products which were internationally traded in commercially significant quantities prior to 1982, such as bags, sacks, carpetbacking, cordage, luggage, mats, mattings and carpets typically made from fibres such as jute, coir, sisal, abaca, maguay and henequen;
 - (c) products made of pure silk.

For such products, the provisions of Article XIX of GATT 1994, as interpreted by the Agreement on Safeguards, shall be applicable.

**Products within Section XI (Textiles and Textile Articles) of the
Harmonized Commodity Description and Coding System (HS) Nomenclature**

HS No. Product Description

Ch. 50 Silk

- 5004.00 Silk yarn (other than yarn spun from silk waste) not put up for retail sale
- 5005.00 Yarn spun from silk waste, not put up for retail sale
- 5006.00 Silk yarn&yarn spun from silk waste, put up f retail sale; silk-worm gut
- 5007.10 Woven fabrics of noil silk
- 5007.20 Woven fabrics of silk/silk waste, other than noil silk, 85%/more of such fibres
- 5007.90 Woven fabrics of silk, nes

Ch. 51 Wool, fine/coarse animal hair, horsehair yarn & fabric

- 5105.10 Carded wool
- 5105.21 Combed wool in fragments
- 5105.29 Wool tops and other combed wool, other than combed wool in fragments
- 5105.30 Fine animal hair, carded or combed
- 5106.10 Yarn of carded wool,>/=85% by weight of wool, nt put up for retail sale
- 5106.20 Yarn of carded, wool,<85% by weight of wool, not put up for retail sale
- 5107.10 Yarn of combed wool,>/=85% by weight of wool, not put up for retail sale
- 5107.20 Yarn of combed wool,<85% by weight of wool, not put up for retail sale
- 5108.10 Yarn of carded fine animal hair, not put up for retail sale
- 5108.20 Yarn of combed fine animal hair, not put up for retail sale
- 5109.10 Yarn of wool/of fine animal hair,>/=85% by weight of such fibres, put up
- 5109.90 Yarn of wool/of fine animal hair,<85% by weight of such fibres, put up
- 5110.00 Yarn of coarse animal hair or of horsehair
- 5111.11 Woven fabrics of carded wool/fine animal hair,>/=85% by weight,</=300 g/m2
- 5111.19 Woven fabrics of carded wool/fine animal hair,>/=85% by weight,>300 g/m2
- 5111.20 Woven fabric of carded wool/fine animal hair,>/=85% by wt, mixd w m-m fi
- 5111.30 Woven fabric of carded wool/fine animal hair,>/=85% by wt, mixd w m-m fib
- 5111.90 Woven fabrics of carded wool/fine animal hair,>/= 85% by weight, nes
- 5112.11 Woven fabric of combed wool/fine animal hair,>/=85% by weight,</=200 g/m2
- 5112.19 Woven fabrics of combed wool/fine animal hair,>/=85% by weight,>200 g/m2
- 5112.20 Woven fabrics of combed wool/fine animal hair,<85% by wt, mixd w m-m fil
- 5112.30 Woven fabrics of combed wool/fine animal hair,<85% by wt, mixd w m-m fib
- 5112.90 Woven fabrics of combed wool/fine animal hair, <85% by weight, nes
- 5113.00 Woven fabrics of coarse animal hair or of horsehair

Ch. 52 Cotton

- 5204.11 Cotton sewing thread >/=85% by weight of cotton, not put up for retail sale
- 5204.19 Cotton sewing thread,<85% by weight of cotton, not put up for retail sale
- 5204.20 Cotton sewing thread, put up for retail sale
- 5205.11 Cotton yarn,>/=85%,single, uncombed,>/=714.29 dtex, nt put up
- 5205.12 Cotton yarn,>/=85%,single, uncombed, 714.29 >dtex>/=232.56, not put up
- 5205.13 Cotton yarn,>/=85%,single, uncombed, 232.56>dtex>/=192.31, not put up
- 5205.14 Cotton yarn,>/=85%,single, uncombed, 192.31 >dtex>/=125, not put up
- 5205.15 Cotton yarn,>/=85%,single, uncombed,<125 dtex, nt put up f retail sale
- 5205.21 Cotton yarn,>/=85%, single, combed,>/=714.29, not put up
- 5205.22 Cotton yarn,>/=85%,single, combed, 714.29 >dtex>/=232.56, not put up
- 5205.23 Cotton yarn,>/=85%, single, combed, 232.56 >dtex>/=192.31, not put up
- 5205.24 Cotton yarn,>/=85%, single, combed, 192.31 >dtex>/=125, not put up

HS No. Product Description

5205.25	Cotton yarn,>=85%,single, combed,<125 dtex, not put up for retail sale
5205.31	Cotton yarn,>=85%, multi, uncombed,>=714.29 dtex, not put up, nes
5205.32	Cotton yarn,>=85%,multi, uncombed, 714.29 >dtex>=232.56, not put up, nes
5205.33	Cotton yarn,>=85%,multi, uncombed, 232.56 >dtex>=192.31, not put up, nes
5205.34	Cotton yarn,>=85%,multi, uncombed, 192.31 >dtex>=125, nt put up, nes
5205.35	Cotton yarn,>=85%,multi, uncombed, <125 dtex, not put up, nes
5205.41	Cotton yarn,>=85%, multiple, combed,>=714.29 dtex, not put up, nes
5205.42	Cotton yarn,>=85%,multi, combed, 714.29 >dtex>=232.56, nt put up, nes
5205.43	Cotton yarn,>=85%,multi, combed, 232.56 >dtex>=192.31, nt put up, nes
5205.44	Cotton yarn,>=85%,multiple, combed, 192.31 >dtex>=125, not put up, nes
5205.45	Cotton yarn,>=85%, multiple, combed, <125 dtex, not put up, nes
5206.11	Cotton yarn, <85%, single, uncombed,>=714.29, not put up
5206.12	Cotton yarn, <85%, single, uncombed, 714.29 >dtex>=232.56, nt put up
5206.13	Cotton yarn, <85%, single, uncombed, 232.56 >dtex>=192.31, not put up
5206.14	Cotton yarn, <85%, single, uncombed, 192.31 >dtex>=125, nt put up
5206.15	Cotton yarn,<85%,single, uncombed,<125 dtex, not put up for retail sale
5206.21	Cotton yarn, <85%, single, combed,>=714.29 dtex, nt put up
5206.22	Cotton yarn, <85%, single, combed, 714.29 >dtex>=232.56, not put up
5206.23	Cotton yarn, <85%, single, combed, 232.56 >dtex>=192.31, not put up
5206.24	Cotton yarn, <85%, single, combed, 192.31 >dtex>=125, not put up
5206.25	Cotton yarn,<85%,single, combed,<125 dtex, not put up for retail sale
5206.31	Cotton yarn, <85%, multiple, uncombed,>=714.29, not put up, nes
5206.32	Cotton yarn,<85%,multiple, uncombed, 714.29 >dtex>=232.56, nt put up, nes
5206.33	Cotton yarn,<85%,multiple, uncombed, 232.56 >dex>=192.31, nt put up, nes
5206.34	Cotton yarn,<85%,multiple, uncombed, 192.31 >dtex>=125, nt put up, nes
5206.35	Cotton yarn, <85%, multiple, uncombed, <125 dtex, not put up, nes
5206.41	Cotton yarn, <85%, multiple, combed,>=714.29, nt put up, nes
5206.42	Cotton yarn,<85%,multiple, combed, 714.29 >dtex>=232.56, nt put up, nes
5206.43	Cotton yarn,<85%,multiple, combed, 232.56 >dtex>=192.31, nt put up, nes
5206.44	Cotton yarn,<85%,multiple, combed, 192.31 >dtex>=125, nt put up, nes
5206.45	Cotton yarn, <85%, multiple, combed, <125 dtex, not put up, nes
5207.10	Cotton yarn (other than sewing thread)>=85% by weight of cotton, put up
5207.90	Cotton yarn (other than sewg thread) <85% by wt of cotton, put up f retl sale
5208.11	Plain weave cotton fabric,>=85%, not more than 100 g/m2, unbleached
5208.12	Plain weave cotton fabric,>=85%, >100 g/m2 to 200 g/m2, unbleached
5208.13	Twill weave cotton fabric,>=85%, not more than 200 g/m2, unbleached
5208.19	Woven fabrics of cotton,>=85%, not more than 200 g/m2, unbleached, nes
5208.21	Plain weave cotton fabrics,>=85%, not more than 100 g/m2, bleached
5208.22	Plain weave cotton fabric,>=85%, >100 g/m2 to 200 g/m2, bleached
5208.23	Twill weave cotton fabric,>=85%, not more than 200 g/m2, bleached
5208.29	Woven fabrics of cotton,>=85%, nt more than 200 g/m2, bleached, nes
5208.31	Plain weave cotton fabric,>=85%, not more than 100 g/m2, dyed
5208.32	Plain weave cotton fabric,>=85%,>100g/m= to 200g/m=, dyed
5208.33	Twill weave cotton fabrics,>=85%, not more than 200 g/m2, dyed
5208.39	Woven fabrics of cotton,>=85%, not more than 200 g/m2, dyed, nes
5208.41	Plain weave cotton fabric,>=85%, not more than 100 g/m2, yarn dyed
5208.42	Plain weave cotton fabrics,>=85%, >100 g/m2 to 200 g/m2, yarn dyed
5208.43	Twill weave cotton fabric,>=85%, not more than 200 g/m2, yarn dyed
5208.49	Woven fabrics of cotton,>=85%,nt more than 200 g/m2, yarn dyed, nes
5208.51	Plain weave cotton fabrics,>=85%, not more than 100 g/m2, printed
5208.52	Plain weave cotton fabric,>=85%, >100 g/m2 to 200 g/m2, printed

HS No. Product Description

5208.53	Twill weave cotton fabric,>/=85%, not more than 200 g/m2, printed
5208.59	Woven fabrics of cotton,>/=85%, not more than 200 g/m2, printed, nes
5209.11	Plain weave cotton fabric,>/=85%, more than 200 g/m2, unbleached
5209.12	Twill weave cotton fabric,>/=85%, more than 200 g/m2, unbleached
5209.19	Woven fabrics of cotton,>/=85%,more than 200 g/m2, unbleached, nes
5209.21	Plain weave cotton fabric,>/=85%, more than 200 g/m2, bleached
5209.22	Twill weave cotton fabrics,>/=85%, more than 200 g/m2, bleached
5209.29	Woven fabrics of cotton,>/=85%, more than 200 g/m2, bleached, nes
5209.31	Plain weave cotton fabrics,>/=85%, more than 200 g/m2, dyed
5209.32	Twill weave cotton fabrics,>/=85%, more than 200 g/m2, dyed
5209.39	Woven fabrics of cotton,>/=85%, more than 200 g/m2, dyed, nes
5209.41	Plain weave cotton fabrics,>/=85%, more than 200 g/m2, yarn dyed
5209.42	Denim fabrics of cotton,>/=85%, more than 200 g/m2
5209.43	Twill weave cotton fab, other than denim,>/=85%,more than 200 g/m2, yarn dyed
5209.49	Woven fabrics of cotton,>/=85%, more than 200 g/m2, yarn dyed, nes
5209.51	Plain weave cotton fabrics,>/=85%, more than 200 g/m2, printed
5209.52	Twill weave cotton fabrics,>/=85%, more than 200 g/m2, printed
5209.59	Woven fabrics of cotton,>/=85%, more than 200 g/m2, printed, nes
5210.11	Plain weave cotton fab,<85% mixd w m-m fib, not more than 200 g/m2, unbl
5210.12	Twill weave cotton fab,<85% mixd w m-m fib, not more than 200 g/m2, unbl
5210.19	Woven fab of cotton,<85% mixd with m-m fib,</=200 g/m2, unbl, nes
5210.21	Plain weave cotton fab,<85% mixd w m-m fib, not more than 200 g/m2, bl
5210.22	Twill weave cotton fab,<85% mixd w m-m fib, not more than 200 g/m2, bl
5210.29	Woven fabrics of cotton,<85% mixd with m-m fib,</=200 g/m2, bl, nes
5210.31	Plain weave cotton fab,<85% mixd w m-m fib, not more than 200 g/m2, dyd
5210.32	Twill weave cotton fab,<85% mixd w m-m fib, not more than 200 g/m2, dyd
5210.39	Woven fabrics of cotton,<85% mixd with m-m fib,</=200 g/m2, dyed, nes
5210.41	Plain weave cotton fab,<85% mixd w m-m fib, nt mor thn 200g/m2, yarn dyd
5210.42	Twill weave cotton fab,<85% mixd w m-m fib, nt mor thn 200g/m2, yarn dyd
5210.49	Woven fabrics of cotton,<85% mixed w m-m fib,</=200g/m2, yarn dyed, nes
5210.51	Plain weave cotton fab,<85% mixd w m-m fib, nt more thn 200 g/m2, printd
5210.52	Twill weave cotton fab,<85% mixd w m-m fib, nt more thn 200g/m2, printd
5210.59	Woven fabrics of cotton,<85% mixed with m-m fib,</=200g/m2, printed, nes
5211.11	Plain weave cotton fab,<85% mixd w m-m fib, more thn 200 g/m2, unbleachd
5211.12	Twill weave cotton fab,<85% mixed with m-m fib, more than 200 g/m2, unbl
5211.19	Woven fabrics of cotton,<85% mixd w m-m fib, more thn 200g/m2, unbl, nes
5211.21	Plain weave cotton fab,<85% mixd w m-m fib, more than 200 g/m2, bleachd
5211.22	Twill weave cotton fab,<85% mixd w m-m fib, more than 200 g/m2, bleachd
5211.29	Woven fabrics of cotton,<85% mixd w m-m fib, more than 200 g/m2, bl, nes
5211.31	Plain weave cotton fab,<85% mixed with m-m fib, more than 200 g/m2, dyed
5211.32	Twill weave cotton fab,<85% mixed with m-m fib, more than 200 g/m2, dyed
5211.39	Woven fabrics of cotton,<85% mixd w m-m fib, more than 200 g/m2, dyd, nes
5211.41	Plain weave cotton fab,<85% mixd w m-m fib, more than 200 g/m2, yarn dyd
5211.42	Denim fabrics of cotton, <85% mixed with m-m fib, more than 200 g/m2
5211.43	Twill weave cotton fab, other than denim,<85% mixd w m-m fib,>200g/m2, yarn dyd
5211.49	Woven fabrics of cotton,<85% mixd with m-m fib,>200 g/m2, yarn dyed, nes
5211.51	Plain weave cotton fab,<85% mixd w m-m fib, more than 200 g/m2, printd
5211.52	Twill weave cotton fab,<85% mixd w m-m fib, more than 200 g/m2, printd
5211.59	Woven fabrics of cotton,<85% mixd w m-m fib, mor thn 200g/m2, printd, nes
5212.11	Woven fabrics of cotton, weighing not more than 200 g/m2, unbleached, nes
5212.12	Woven fabrics of cotton, weighing not more than 200 g/m2, bleached, nes

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5212.13	Woven fabrics of cotton, weighing not more than 200 g/m ² , dyed, nes
5212.14	Woven fabrics of cotton, ≤200g/m ² , of yarns of different colours, nes
5212.15	Woven fabrics of cotton, weighing not more than 200 g/m ² , printed, nes
5212.21	Woven fabrics of cotton, weighing more than 200 g/m ² , unbleached, nes
5212.22	Woven fabrics of cotton, weighing more than 200 g/m ² , bleached, nes
5212.23	Woven fabrics of cotton, weighing more than 200 g/m ² , dyed, nes
5212.24	Woven fabrics of cotton, >200 g/m ² , of yarns of different colours, nes
5212.25	Woven fabrics of cotton, weighing more than 200 g/m ² , printed, nes

Ch. 53 Other vegetable textile fibres; paper yarn & woven fab

5306.10	Flax yarn, single
5306.20	Flax yarn, multile (folded) or cabled
5307.10	Yarn of jute or of other textile bast fibres, single
5307.20	Yarn of jute or of oth textile bast fibres, multiple (folded) or cabled
5308.20	True hemp yarn
5308.90	Yarn of other vegetable textile fibres
5309.11	Woven fabrics, containg 85% or more by weight of flax, unbleached or bl
5309.19	Woven fabrics, containing 85% or more by weight of flax, other than unbl or bl
5309.21	Woven fabrics of flax, containg <85% by weight of flax, unbleached or bl
5309.29	Woven fabrics of flax, containing <85% by weight of flax, other than unbl or bl
5310.10	Woven fabrics of jute or of other textile bast fibres, unbleached
5310.90	Woven fabrics of jute or of other textile bast fibres, other than unbleached
5311.00	Woven fabrics of oth vegetable textile fibres; woven fab of paper yarn

Ch. 54 Man-made filaments

5401.10	Sewing thread of synthetic filaments
5401.20	Sewing thread of artificial filaments
5402.10	High tenacity yarn (other than sewg thread),nylon/oth polyamides fi, nt put up
5402.20	High tenacity yarn (other than sewg thread),of polyester filaments, not put up
5402.31	Texturd yarn nes, of nylon/oth polyamides fi, ≤50tex/s.y.,not put up
5402.32	Texturd yarn nes, of nylon/oth polyamides fi, >50 tex/s.y.,not put up
5402.33	Textured yarn nes, of polyester filaments, not put up for retail sale
5402.39	Textured yarn of synthetic filaments, nes, not put up
5402.41	Yarn of nylon or other polyamides fi, single, untwisted, nes, not put up
5402.42	Yarn of polyester filaments, partially oriented, single, nes, not put up
5402.43	Yarn of polyester filaments, single, untwisted, nes, not put up
5402.49	Yarn of synthetic filaments, single, untwisted, nes, not put up
5402.51	Yarn of nylon or other polyamides fi, single, >50 turns/m, not put up
5402.52	Yarn of polyester filaments, single, >50 turns per metre, not put up
5402.59	Yarn of synthetic filaments, single, >50 turns per metre, nes, not put up
5402.61	Yarn of nylon or other polyamides fi, multiple, nes, not put up
5402.62	Yarn of polyester filaments, multiple, nes, not put up
5402.69	Yarn of synthetic filaments, multiple, nes, not put up
5403.10	High tenacity yarn (other than sewg thread),of viscose rayon filamt, nt put up
5403.20	Textured yarn nes, of artificial filaments, not put up for retail sale
5403.31	Yarn of viscose rayon filaments, single, untwisted, nes, not put up
5403.32	Yarn of viscose rayon filaments, single, >120 turns per m, nes, nt put up
5403.33	Yarn of cellulose acetate filaments, single, nes, not put up
5403.39	Yarn of artificial filaments, single, nes, not put up
5403.41	Yarn of viscose rayon filaments, multiple, nes, not put up
5403.42	Yarn of cellulose acetate filaments, multiple, nes, not put up

