

NOTE No. 169

Her Majesty's Embassy for the United Kingdom present their compliments to the Department of State and have the honour to refer to the hearings on trade policy currently being held by the Committee on Ways and Means of the House of Representatives.

A number of British manufacturing and trade associations have prepared statements which are relevant to the subjects under discussion by the Ways and Means Committee; and the Embassy would be grateful if the State Department could facilitate the transmission of these documents to the Committee.

The statements which are enclosed with this Note are:

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(c) A submission by the Rubber and Plastic Footwear Manufacturers' Association.

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BRITISH EMBASSY,
Washington, D.C., June 28, 1968.

STATEMENT OF R. J. MAY, HON. SECRETARY, RUBBER AND PLASTICS FOOTWEAR
MANUFACTURERS ASSOCIATION, LIVERPOOL, ENGLAND

To the Chairman:

SIR:

1. The following submission is made by the Rubber and Plastics Footwear Manufacturers Association, Rice Lane, Walton, Liverpool, 9, England. The Association represents five major manufacturers of rubber/plastic and rubber-soled footwear with canvas uppers in Great Britain. They are jointly responsible for 50% of the total production of this type of footwear in the United Kingdom.

Our purpose in putting forward this submission is to clarify the viewpoint of the members of our Association to the present U.S. Tariff system and its effect on the trade between U.K. Manufacturers of rubber/plastic/canvas footwear and the United States.

2. *Reference to U.S. Tariff Items*

This submission relates to Tariff items:

700.60 Rubber Soled Footwear with Fabric Uppers.

700.53 Natural Rubber Footwear.

3. *Present U.S. Tariff Structure.—*

(a) *Rubber Soled Footwear with Fabric Uppers. TSUS item 700.60*

Currently footwear under this item is subject to a rate of duty at 20% ad valorem of the A.S.P. of like, or similar domestically produced articles. Items, which are not like or not similar are not subject to A.S.P. The bulk of this type of footwear imported into the U.S. and produced by U.K. rubber and canvas footwear manufacturers is dutiable on A.S.P., being primarily tennis types, Oxfords, Basketball shoes and Sneaker styles.

(b) *Natural Rubber Footwear. TSUS item 700.53*

Footwear under this item is subject to valuation on the export value or foreign value, whichever is the higher. This duty works out on average at 37½% of the United Kingdom wholesale price of such articles.

4. *Tariff Schedule Amendment Act 1965*

By this Act rubber footwear under item 700.53 entering the U.S. was no longer subject to valuation on the basis of A.S.P. or C.A.V. whereas under the former tariff structure, protective footwear which contained less than 10% of natural rubber content carried a duty of 12½% ad valorem. Importers of footwear within this category are faced, under the above Act, with a rise in duty of 25%.

5. *Economic Effects to the U.K. Manufacturer of the Tariff Schedule Amendments Act of 1965—Rubber Footwear*

Exports to the U.S.A. of rubber footwear over the past seven years are shown below: