7. Conclusion and Submission

The figures below show total imports of rubber footwear and rubber-soled footwear with fabric uppers into the United States for the period 1960 to 1965.

IMPORTS RUBBER AND RUBBER-SOLED FOOTWEAR WITH FABRIC UPPERS

	Pairs	British pounds
1960	307, 156	175, 786
1961	370, 517	167, 952
1962	721, 247	255, 361
1963	549, 553	236, 589
1963	498, 419	192, 525
1964	383, 441	199, 403

We conclude that if the application of a new tariff structure on rubber footwear can result in a reduction of imports to the United States from the U.K. by 33% in volume, and 11% in value—see para 5 above, the introduction of a like tariff structure for rubber soled footwear with fabric uppers is likely to have a similar effect. Thus taking imports under both items on this basis against an average year's imports from the figures given in this para. (7) above, there would be a fall from around 400,000 pairs to 270,000 pairs in volume and from around £200,000 to £160,000 in value. This would be to the detriment of the trade conducted in the United States by members of our Association.

We further consider that, whilst we appreciate that domestic manufacturers of rubber and canvas footwear in the United States would wish to be protected against unfair competition from inports of equivalent products produced in low labour cost countries and in those countries whose manufacturers enjoy subsidies, this situation does not apply to rubber footwear and rubber footwear with fabric uppers manufactured in the U.K. whose rubber and canvas footwear manufacturers do not enjoy subsidies nor conditions of cheap labour.

We note that U.S. annual production of rubber soled fabric upper footwear is increasing steadily from 71 million pairs in 1958 to 166 billion pairs in 1965 and, whilst imports have risen, they only represent a ratio of imports to consumption of 17% in 1965, compared with 59.1% in the U.K. In the light of this we feel that additional protection by means of a revised Tariff structure is not called for at this time, particularly if it mitigates against the liberalisation of world trade.

We, therefore, submit that any revisions that the Tariff Commission might consider in relation to the Tariff structure on TSUS 700.60, should not be contrary to the spirit of the G.A.T.T. agreements and, with a view to liberating world trade, should be aimed at lowering and not raising the rate of duty on imports into the United States.

H. J. MAY,
Hon. Secretary, Rubber and Plastics Footwear Manufacturers Association.

STATEMENT OF PETER BOMMARITO, PRESIDENT, UNITED RUBBER, CORK, LINOLEUM & PLASTIC WORKERS OF AMERICA, AFL-CIO

Mr. Chairman and members of the committee, my name is Peter Bommarito, International President of the United Rubber, Cork, Linoleum and Plastic Workers of America, more commonly known as the URW. I am pleased to have the opportunity to express our views on, and give our support to, Section 401 (b) of the Trade Expansion Act of 1968.

Much effort has been made on the part of the URW and other interested parties to follow the "progress" of United States trade policy with regard to the American Selling Price system of establishing rates of duty for rubber-soled footwear. This has been especially true since 1965, as spokesmen for the URW have stated our views time and time again before various Congressional committees and to the President of the United States.