



The Fashion Jewelry & Accessories Trade Association
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FJATA Comments re: H.R. 5171; (112th Congress, 2nd Session, Maloney (NY-14))— *To suspend temporarily (through December 31, 2015) the duty (11%) on U.S. imports of imitation jewelry necklaces or bracelets, valued \$10 each or higher (provided for in 7117.19.90).*

The Fashion Jewelry and Accessories Trade Association (FJATA) is pleased to submit comments regarding the above-mentioned bill before the U.S. House Subcommittee on Trade. FJATA represents the interests of manufacturers, suppliers and retailers of jewelry and accessories. The FJATA has over 225 member companies, from small independent businesses to large multi-national corporations.

FJATA supports this legislation since it will provide some relief to jewelry importers faced with the obligation to pay import duties. While members have reported that the cost of a typical imported necklace or bracelet can range from .25 to \$3.00, the principle of H.R. 5171 is a good one. Saving American companies money on import duties can benefit the economy, the company, and therefore produce jobs. However, FJATA recommends suspending duties on all imitation jewelry imports regardless of price threshold so that the legislation can maximize the benefit to American companies.

In fact, FJATA would like to see an expansion of the jewelry categories included in H.R. 5171 to include all fashion jewelry, not just necklaces and bracelets. ASTM F2923-11 defines the following items as jewelry: anklets, arm cuffs, bracelets, brooches, chains, crowns or tiaras, cuff links, hair accessories with significant decorative elements, earrings, ear cuffs, necklaces, pins (such as tie tacks and trading pins), rings, and body piercing jewelry. Inclusion of categories that go beyond “necklaces and bracelets” would be an effective way to broaden the scope of this legislation and add to the economic benefits accruing to American companies from the bill. For example, tariffs apply to other jewelry products as follows:

7117.11.00 - Imitation cuff links and studs, of base metal whether or not plated with precious metal, subject to 8% duty.

7117.90.55 - Other imitation jewelry not valued over 20 cents per dozen pieces or parts, subject to 7.2% duty.

7117.90.90 - Other imitation jewelry valued over 20 cents per dozen pieces or parts, subject to 11% duty.

7104.90.50 - Synthetic or reconstructed precious or semi-precious stones, subject to 6.4% duty.

7113.11.20 - Jewelry and parts made of silver but valued not over \$18 per dozen pieces or parts, subject to 13.5% duty.

7113.19.10 - Jewelry and parts made of other precious metal in the form of chain, or similar articles, whether or not set with imitation gemstones, subject to 7% duty.

These are simply examples. There are a number of others in heading 7113 as well as 7116.

In summary: FJATA supports the temporary duty suspension, and supports expanding the suspension to include all jewelry categories and all price points as described above. FJATA applauds Representative Maloney for her leadership in promoting legislation that can economically benefit American companies.

Sincerely,

A handwritten signature in black ink that reads "Brent Cleaveland". The signature is written in a cursive, slightly slanted style.

Brent Cleaveland
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