



American Medical Manufacturers Association

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Jennifer Thornton

General Counsel, Office of the United States Trade Representative

600 17th Street NW, Washington, DC 20508

Re: Comments of the American Medical Manufacturers Association on the Initiation of 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 No. USTR-2026-0133)

Dear General Counsel Thornton:

The American Medical Manufacturers Association (AMMA) submits these comments in response to the Section 301 investigations initiated by the Office of the United States Trade Representative (USTR) examining whether the failure of the economies listed in Annex A to impose and effectively enforce a prohibition on the importation of goods produced with forced labor is unreasonable or discriminatory and burdens or restricts U.S. commerce. AMMA is the leading national trade association representing domestic manufacturers of personal protective equipment (PPE) and needles and syringes, which American hospitals, healthcare workers, and first responders depend every day.

AMMA CONDEMNS FORCED LABOR

AMMA unequivocally condemns forced labor in all its forms. The exploitation of workers for commercial gain is morally indefensible and economically damaging to law-abiding manufacturers worldwide. The ILO estimates that as of 2021, 28 million people globally are in forced labor, and that the profits derived from forced labor in the global private economy amounted to approximately \$63.9 billion annually as of 2024. These are not abstract figures. They represent a systematic distortion of international commerce that harms workers, undermines fair competition, and disadvantages manufacturers who do the right thing.

In a 2024 policy statement, AMMA explicitly identified forced labor alongside state subsidies, dumping, and tariff evasion as a practice that allows certain foreign manufacturers to artificially suppress production costs and undercut domestic competitors. The economies under investigation in this proceeding include major suppliers of PPE and needles and syringes to the United States. Their failure to prohibit and enforce bans on the importation of goods produced with forced labor allows those distortions to persist and to flow directly into U.S. markets.



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AMMA PROMOTES DOMESTIC MANUFACTURING UNDER FAIR, LEGAL, AND HUMANE CONDITIONS

AMMA's members manufacture in the United States, in full compliance with U.S. labor law, and under fair and humane working conditions. They pay prevailing American wages, provide safe workplaces, and operate without the artificial cost advantages that forced labor confers on foreign competitors. They have invested hundreds of millions of dollars in domestic manufacturing infrastructure and in American workers.

The United States now imports approximately 80 to 90 percent of its total PPE supply. This dependence is not a market outcome. It is the result of foreign practices, including forced labor, that have suppressed global prices below the level any responsible domestic manufacturer can match. When the countries where foreign producers operate further fail to prohibit the importation of goods produced with forced labor, they compound the distortion and deepen the harm to U.S. industry.

AMMA strongly supports these investigations. The failure of trading partner economies to enforce forced labor import prohibitions is an unreasonable trade practice that burdens U.S. commerce and disadvantages American manufacturers who compete on a foundation of fair, legal, and humane labor. AMMA urges USTR to find the conduct under examination actionable, to prioritize PPE and needles and syringes in any resulting remedies, and to take meaningful action to level the playing field for domestic manufacturers.

AMMA thanks USTR for the opportunity to submit these comments.

Respectfully submitted,

Eric Axel

Executive Director

American Medical Manufacturers Association