

Caribbean Basin Economic Recovery Act: Impact on U.S. Industries and Consumers and on Beneficiary Countries

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Caribbean Basin Economic Recovery Act: Impact on U.S. Industries and Consumers and on Beneficiary Countries

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Abbreviations and Acronyms

Acronym	Term
AAFA	American Apparel & Footwear Association
ADIH	Association des Industries d'Haïti (Association of Industries of Haiti)
AGOA	African Growth and Opportunity Act
BLS	U.S. Bureau of Labor Statics (USDOL)
CAFTA-DR	Dominican Republic-Central America-United States Free Trade Agreement
CAGR	compound annual growth rate
CARICOM	Caribbean Community
CBERA	Caribbean Basin Economic Recovery Act
CBEREA	Caribbean Basin Economic Recovery Expansion Act
CBI	Caribbean Basin Initiative
СВТРА	Caribbean Basin Trade Partnership Act
CGCL	Caribbean Gas Chemical Ltd. (Trinidad and Tobago)
COP	Conference of the Parties (UN)
COP29	The 29th session of the Conference of the Parties to the United Nations Framework
CO1 23	Convention on Climate Change
СТО	Caribbean Tourism Organization
DR	Dominican Republic
EIAP	Earned Import Allowance Program
EPS	expandable polystyrene
EU	European Union
FATCA	Foreign Account Tax Compliance Act
FDI	foreign direct investment
FPSO	floating production storage and offloading
FTZ	foreign trade zone
GDP	gross domestic product
GHG	greenhouse gas
GSP	Generalized System of Preferences
HELP Act	Haiti Economic Lift Program Act of 2010
HHI	Herfindahl–Hirschman index
HOPE Acts	HOPE I and HOPE II (see below)
HOPE I	Haitian Hemispheric Opportunity through Partnership Encouragement Act of 2006
HOPE II	Haitian Hemispheric Opportunity through Partnership Encouragement Act of 2008
HS	Harmonized Commodity Description and Coding System (global tariff schedule)
HTS	Harmonized Tariff Schedule of the United States
ILO	International Labour Organization
IMF	International Monetary Fund
ISIC	International Standard Industrial Classification of all economic activities
ITA	International Trade Administration (USDOC)
LNG	liquefied natural gas
MHTL	Methanol Holdings (Trinidad) Limited (Trinidad and Tobago)
MFN	most-favored nation (most-favored-nation status; see also NTR)
mt	metric ton
NA	not available
NAICS	North American Industry Classification System
NGC	The National Gas Company of Trinidad and Tobago
NAICS	North American Industry Classification System
NTR	normal trade relations (U.S. term; same as MFN elsewhere)
OECD	Organisation for Economic Co-operation and Development
OTEXA	Office of Textiles and Apparel (USDOC)

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Acronym	Term
PE	partial equilibrium
QCEW	Quarterly Census of Employment and Wages (USDOC, BLS)
R&D	research and development
ROOs	rules of origin
SMEs	square meter equivalents
TAICNAR	Technical Assistance Improvement and Compliance Needs Assessment and Remediation Program
TPL	tariff preference level
TRQ	tariff-rate quota
UN	United Nations
UNCTAD	UN Conference on Trade and Development
USDOC	U.S. Department of Commerce
USDOL	U.S. Department of Labor
USITC	U.S. International Trade Commission
USMCA	United States-Mexico-Canada Agreement
USTR	Office of the U.S. Trade Representative
WDI	World Development Indicators (World Bank)
WEO	World Economic Outlook (IMF)
WITS	World Integrated Trade Solution
WTO	World Trade Organization
WTTC	World Travel and Tourism Council

Executive Summary

Congress enacted the Caribbean Basin Economic Recovery Act (CBERA) in 1983 to encourage economic growth and development in Caribbean Basin countries by promoting increased production and exports of nontraditional products. Section 215 of CBERA, as amended, requires the Commission to report biennially to the President and Congress by September 30 of each reporting year on the impact of CBERA on the U.S. economy generally and on U.S. industries and consumers, as well as on the economies of the beneficiary countries.¹

This report is the 27th in the series and covers 2023–24. It provides a retrospective analysis of U.S. imports that entered under the CBERA program. Using a partial equilibrium model approach, the report assesses the economic impact of the CBERA program on U.S. industries and consumers, as well as on beneficiary countries in 2023–24. The report also assesses the probable future economic effect using a qualitative approach. It studies different dimensions of program usage and impact on beneficiaries, incorporating a range of indicators, including export diversification, research and development (R&D) intensity, utilization rate, and per capita CBERA-eligible export value. The report uses information and data from other federal government agencies, foreign governments in the CBERA region, nongovernmental organizations, and testimony provided at a public hearing the Commission held on February 20, 2025. In addition, the report incorporates information provided in written public submissions from interested persons.

During the longer period 2020–24, the value of U.S. merchandise imports from CBERA beneficiaries averaged \$9.3 billion per year. U.S. imports increased from \$5.1 billion in 2020 to a peak of \$11.6 billion in 2022, fell slightly in 2023, and rebounded to \$11.6 billion in 2024.³ U.S. imports claimed under the CBERA program remained flat from 2020 to 2024 but fluctuated between those years, rising significantly from \$1.8 billion in 2020 to \$2.8 billion in 2022, before falling to \$2.0 billion in 2023 and to \$1.8 billion in 2024. Over the five-year period, claimed CBERA imports averaged \$2.1 billion per year.⁴

The impact of the CBERA program on the U.S. economy was small in 2023–24, with imports under the program equaling 0.06 percent of total U.S. imports. The impact of the CBERA program, considering pertinent supply and demand factors, is likely to remain negligible in the near future.

¹ The 17 CBERA beneficiaries at year-end 2024 were Antigua and Barbuda, Aruba, The Bahamas, Barbados, Belize, the British Virgin Islands, Curacao, Dominica, Grenada, Guyana, Haiti, Jamaica, Montserrat, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, and Trinidad and Tobago.

² Throughout this report, the term "CBERA program" refers to CBERA as amended by the Caribbean Basin Trade Partnership Act (CBTPA) of 2000, the Haitian Hemispheric Opportunity through Partnership Encouragement Acts of 2006 (HOPE I) and 2008 (HOPE II) (jointly referred to in this report as the HOPE Acts), the Haitian Economic Lift Program (HELP) Act of 2010, and other legislation.

³ Throughout this report, the terms "CBERA beneficiary" and "CBERA beneficiary country" refer to a country or territory for which a proclamation is in effect designating it as a beneficiary. CBERA, Beneficiary Country, 19 U.S.C. § 2702(a)(1)(A).

⁴ Throughout the report, the terms "imports under CBERA," "imports under the CBERA program," and "CBERA imports" refer to CBERA-eligible products that claim preference under the CBERA program.

The CBERA program continues to positively impact several Caribbean Basin countries. In 2023–24, Trinidad and Tobago, Haiti, and Jamaica were the top three sources of U.S. imports under CBERA, collectively accounting for 92 percent of such imports. In 2024 alone, use of the CBERA program increased total export revenue across all beneficiary countries by an estimated \$348.0 million—a 27.9 percent gain over the estimated levels of export revenue if the program were not available. Haiti experienced the greatest benefit.

As shown in <u>figure ES.1</u>, imports under the CBERA program made up less than 16 percent of U.S. imports from CBERA beneficiaries in 2024.⁵ All CBERA beneficiaries enjoyed normal trade relations (NTR) with the United States, and NTR-dutiable imports represented the largest import category from these countries, accounting for 46.3 percent of all imports from the CBERA region. NTR duty-free imports were the second-largest import category from the CBERA region (37.7 percent). U.S. imports of goods from CBERA beneficiaries entered as qualified products under the CBERA program to a much greater extent than under the Generalized System of Preferences (GSP) program. Only \$2 million worth (0.1 percent) of U.S. imports from CBERA beneficiaries entered under the GSP program in 2024.⁶

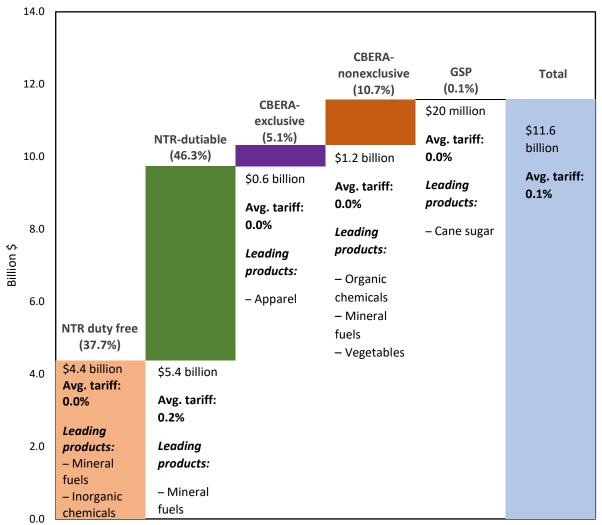
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⁵ Total imports under the CBERA program are the sum of the 5.1 percent share of CBERA-exclusive imports and 10.7 percent CBERA-nonexclusive imports. "CBERA-exclusive" imports are imports of products that can receive preferential entry only under the CBERA program. Almost all CBERA-exclusive products are textile and apparel products claiming benefits under the Haiti HOPE/HELP program. "CBERA-nonexclusive" imports are imports of products that entered the United States under the CBERA program but were also eligible for entry under GSP. GSP authorization expired on December 31, 2020, so duty-free entry under GSP was not available for 2024, the year corresponding to the figure. Following past instances of GSP authorization lapsing, legislation renewing the President's authority to grant duty-free treatment under GSP allowed importers to apply for refunds of duties if the article was otherwise eligible for GSP and the importer had claimed the GSP preference at the time of entry. Thus, during 2024, importers had the option of claiming GSP preferences to receive retroactive relief if such a provision were included in any renewal.

⁶ Because GSP expired on December 31, 2020, importers who claim the preference while the program is expired pay duties pending program renewal. Importers can claim a preference under both CBERA and GSP, but duty-free treatment will only be granted under one program. See CBP, Form 7501: Entry Summary, July 15, 2025. p. 13, para. 4, instructions for "Column 31 Line Number."

Figure ES.1 U.S. imports for consumption from CBERA beneficiary countries, by import program, 2024

In billions of dollars and percentages. CBERA = Caribbean Basin Economic Recovery Act; GSP = Generalized System of Preferences; NTR = normal trade relations. Underlying data for this figure can be found in table E.1.



Import program

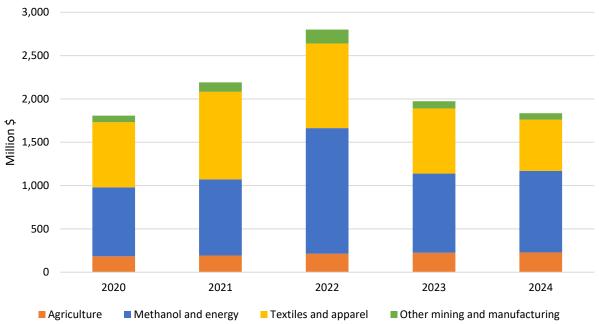
Source: USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025.

Note: Normal trade relations (NTR) status is the U.S. equivalent of most-favored-nation (MFN) status. Goods from a country with NTR status are entitled to normal nondiscriminatory tariff treatment. USITC, HTS (2025) Revision 3, General Note 3(a)(ii), March 2025. Imports entering the United States under NTR may enter either duty free or subject to a rate of duty depending on the good's classification. Imports can also be subject to a quota or tariff-rate quota and could enter duty free if within the quota and subject to a duty if over the quota. "CBERA-exclusive" imports are imports of products eligible for preferential treatment only under CBERA. "CBERA-nonexclusive" imports are imports of products that entered the United States under CBERA but were also eligible for duty-free entry under the Generalized System of Preferences. "Avg. tariff" is the average ad valorem equivalent tariff collected on entry. This is calculated by dividing total duties collected by the total customs value of each respective category.

U.S. Imports Under the CBERA Program

Focusing on the most recent five-year period, after a decline in 2020 due to the onset of the COVID-19 pandemic, U.S. imports under the CBERA program rose from \$1.8 billion in 2020 to \$2.2 billion in 2021, driven primarily by increased imports of textile and apparel products from Haiti. In 2022, imports under the CBERA program reached their highest value of the 2020-24 period (\$2.8 billion) because of an 89.7 percent increase in methanol and energy product exports from Trinidad and Tobago and Guyana from 2020 to 2022. The value of imports under the program declined by 29.5 percent to \$1.9 billion in 2023 and then by an additional 7.0 percent to \$1.8 billion in 2024 (figure ES.2).

Figure ES.2 U.S. imports under the CBERA program, by major product category, 2020–24 In millions of dollars. Underlying data for this figure can be found in appendix table E.2.



Source: USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025. Note: Agriculture products are imported under Harmonized Commodity Description and Coding System (HS) chapters 1-24; energy products are imported under HS subheading 2905.11.20 (methanol) and under HS chapter 27 (other energy products); textile and apparel products are imported under HS chapters 50-63; other mining and manufactured products are products not included under other major product categories.

U.S. Imports by Country Under the CBERA Program

During 2023–24, the top three sources of U.S. imports under the CBERA program in descending order of value were Trinidad and Tobago, Haiti, and Jamaica, jointly accounting for 92 percent of the total on average. U.S. imports under the CBERA program primarily consisted of methanol, crude oil, and textile and apparel goods. These products accounted for 84 percent of all U.S. imports claiming CBERA preferences in 2023 and 83 percent in 2024. The increases in U.S. imports under the CBERA program from 2020 to 2022 were primarily driven by higher U.S. imports of textiles and apparel, almost entirely from Haiti, and of methanol and crude oil, mostly from Trinidad and Tobago and Guyana. The decline in imports under the program from 2022 to 2024 is attributed to the decrease of (1) textile and apparel imports from Haiti, (2) other mining and manufactured products and methanol imports from Trinidad and Tobago, and (3) crude oil imports from Guyana.

U.S. Imports by Product Under the CBERA Program

Imports of methanol and energy products under the CBERA program averaged \$996 million annually during 2020–24. Over this period, methanol and energy products accounted for 47.0 percent of CBERA program imports, followed by textiles and apparel at 37.8 percent, agricultural products at 9.8 percent, and other mining and manufactured products at 5.4 percent.

Methanol and Energy Products

U.S. imports of methanol and energy products—mostly consisting of crude oil—under the CBERA program rose between 2020 and 2022, reaching \$1.4 billion in 2022. They declined significantly to \$914 million in 2023 and then recovered slightly to \$943 million in 2024. Utilization rates of the CBERA program for these imports vary from year to year and were relatively low from 2022 to 2024, particularly for imports of crude oil from Guyana. Despite continued growth in U.S. imports of crude oil from Guyana overall, methanol and energy products entering under the CBERA program declined between 2022 and 2024.

Textiles and Apparel

U.S. imports of textiles and apparel under the CBERA program decreased from \$978 million in 2022 to \$590 million in 2024, a 39.7 percent decline. Haiti accounted for virtually all U.S. textile and apparel imports from CBERA-eligible countries and virtually all U.S. textile and apparel imports under the CBERA program. Although the value of Haiti's exports under the CBERA program declined, the country's utilization rate remained high at 94.1 percent in 2024, compared to 94.9 percent in 2022. The decline in U.S. imports from Haiti is attributed to continuing political instability and security concerns in Haiti, as well as uncertainty about the renewal of trade preferences granted under the Haitian Hemispheric Opportunity through Partnership Encouragement Act of 2006 (HOPE I) and 2008 (HOPE II), and the Haiti Economic Lift Program Act of 2010 (HELP Act), all of which are parts of the CBERA program and are set to expire on September 30, 2025.

Other Mining and Manufactured Products

The value of U.S. imports of other mining and manufactured products under the CBERA program steadily increased from \$77 million in 2020 to a peak of \$160 million in 2022, before declining to \$75 million in 2024 (figure ES.2). Expandable polystyrene imported from The Bahamas accounted for the largest share of imports in this category, followed by melamine from Trinidad and Tobago. U.S. demand for both products is forecast to grow. The utilization rate for The Bahamas, supplier of 71 percent of total imports in 2024 under CBERA in this category, has remained above 90 percent since 2020.

Agricultural Products

U.S. agricultural imports under CBERA have increased each year since 2022 and reached \$228 million in 2024. Fresh and chilled yams from Jamaica were the largest product in this category, followed by "other food preparations, including ingredients for beverage manufacturing, nondairy coffee whiteners, herbal teas, and flavored honey" from Trinidad and Tobago and Jamaica.

Impact of the CBERA Program on the United States in 2023–24

Effect on the U.S. Economy Overall

Overall, the effect of the CBERA program on the U.S. economy, imports, industries, and consumers continued to be small, primarily because U.S. imports under the CBERA program made up a small share of total U.S. imports (0.06 percent in 2024). The effect of the CBERA program on U.S. domestic production, employment, and operating profits was negligible for most U.S. industries.

Effect on U.S. Imports

U.S. imports of products entering under CBERA increased noticeably as a result of CBERA preferences.

According to the Commission's partial equilibrium model results, the CBERA program significantly increased U.S. imports by reducing tariffs. For CBERA-exclusive products (those eligible only under CBERA), average imports rose by 199.6 percent because of a 24.0 percent average tariff reduction, with the largest gains in value seen in manmade fiber sweaters and cotton T-shirts. For CBERA-nonexclusive products (those also eligible under other trade preference programs), average imports under CBERA increased by 12.8 percent because of a smaller average tariff reduction of 4.2 percent, with the highest percentage gain in beverage-related products and the largest value increase in methanol. Products with low NTR duty rates such as petroleum oils showed minimal import increases.

Effect on U.S. Industries

U.S. production and employment gains from exports of apparel inputs to Haiti were significantly higher than losses from T-shirt and methanol imports. According to the Commission's partial equilibrium model results, the CBERA program primarily affected two domestic industries: T-shirts and methanol. For 2024, the CBERA program was estimated to have reduced revenues to the U.S. T-shirt industry by 3.0 percent for manmade-fiber T-shirts and 2.0 percent for cotton T-shirts. The program reduced U.S. methanol industry revenues by an estimated 0.4 percent. The CBERA program is estimated to have resulted in the loss of 36 U.S. workers producing T-shirts and 6 workers producing methanol. The loss of employment was negligible for the other products imported under CBERA program preferences in 2024. CBERA preferences significantly supported U.S. exports of apparel inputs (yarn and fabric) to Haiti driven in part by a requirement for apparel from Haiti to meet the rules of origin of the CBERA program (in particular under HOPE/HELP). U.S. exports of apparel inputs increased by \$75.4 million and supported 181 U.S. jobs in 2024. The largest gains for U.S. industries were linked to inputs for cotton T-shirts, inputs for T-shirts of manmade fibers, sweaters of manmade fibers, and men's trousers. Inputs for cotton T-shirts in particular showed the highest increases in U.S. export revenue (\$22.8 million) and a gain in U.S. employment (55 workers).

Effect on U.S. Consumers

U.S. consumers paid slightly lower prices. In 2024, imports under the CBERA program slightly lowered average U.S. consumer prices. The program reduced prices of leading CBERA-exclusive products by 0.3 percent on average, with the largest decrease of 0.7 percent seen in manmade fiber T-shirts because of their relatively high market share and tariff savings. For non-apparel CBERA-nonexclusive products, price effects were minimal, with only methanol and polystyrene showing modest declines of 0.2 percent, reflecting their limited market share and lower tariff rates.

Probable Future Effect

The future impact of the CBERA program on the U.S. economy and domestic industries is expected to remain small. Because of the narrow industrial base of CBERA beneficiary countries, limited supply growth, and the program's small share of total U.S. imports, the CBERA program's effect on U.S. industries and consumers is expected to be modest. On the supply side, limited growth in export capacity among CBERA beneficiaries—driven by slow tourism growth and declining oil prices, especially in oil-exporting countries like Trinidad and Tobago and Guyana, as well as limited foreign investment, as mentioned below—will prevent significant increases in CBERA exports. Haiti's exports are also expected to decline with the expiration of the HOPE/HELP program on September 30, 2025, especially given that a substantial portion of imports under the program are apparel products from Haiti. Consequently, CBERA exports are expected to remain a small portion of total U.S. imports.

Increased investment in the CBERA region. Foreign direct investment (FDI) has helped CBERA beneficiaries expand export activities, increase productivity, and increase employment; however, new investment in CBERA beneficiaries continues to be primarily in the services sector. Because CBERA only applies to goods trade, this will likely not increase imports under the CBERA program. Global FDI stock in CBERA beneficiaries reached \$1.2 trillion in 2023, marking a 3 percent increase from 2022. Among those countries that experienced net inflows of FDI, Montserrat saw the highest percentage growth at 17 percent, though it received the smallest amount of FDI in value terms, \$49 million. FDI grew by 14 percent in Antigua and Barbuda and Curacao over the same period but Guyana, Trinidad and Tobago, and Aruba saw declines of 40 percent, 7 percent and 4 percent, respectively.

Impact of the CBERA Program on the **Beneficiary Countries**

To assess the impact of the CBERA program on the economies of the beneficiary countries, the Commission examined program usage, analyzed the export specialization pattern over time, and modeled the impact of the CBERA program on these countries. Some countries align export capacity with program use, but others show low or falling utilization rates despite growing eligible exports, contributing to the region's overall decline in CBERA utilization rates. Export diversification increased for some beneficiaries but decreased for others, resulting in an inconclusive overall effect since the last reporting period. CBERA also stimulated exports across beneficiary countries.

Program Usage

Usage of CBERA program trade preferences was affected by the extent to which importers of products eligible for these preferences took advantage of them by claiming the preference, as well as the extent to which CBERA beneficiaries were able to supply products eligible for these preferences. The CBERA program utilization rate measures the rate at which U.S. importers claim CBERA program benefits on imports of CBERA-eligible products and has varied over time and across countries. From 2020 to 2024, the region's per capita exports of CBERA-eligible goods more than doubled—from \$139.50 to \$352.20—indicating strong growth in the eligible export base. However, the regional average utilization rate fell from 71.1 percent to 27.7 percent, suggesting that much of this expanded trade did not benefit from the program's preferences.

Utilization rates vary widely by country. Five countries exceeded 80 percent and seven were below 2 percent. Haiti, Grenada, and The Bahamas consistently maintained over 90 percent utilization rates from 2020 to 2024, supported by key exports like apparel (Haiti), spices and produce (Grenada), and polystyrene (The Bahamas). In contrast, Montserrat, the British Virgin Islands, and Antigua and Barbuda had very low utilization rates, with few or no U.S. imports under CBERA during the same period. Others, including Guyana and Curacao, had high per capita eligible exports but very low utilization rates. In 2024, Guyana had the highest per capita eligible exports—over \$5,000—but a utilization rate of just 0.4 percent.

Factors that affected the program usage included ability to meet U.S. import requirements, impermanence of the CBTPA and Haiti HOPE/HELP, preference margins, mismatch between productive capacity and program eligibility, and other supply and demand factors affecting export activity.

Export Diversification

One objective of CBERA is to encourage export diversification and economic development. This report assesses export diversification across three dimensions for CBERA beneficiaries: breadth (number of products), depth (distribution of export revenues across all products), and research and development (R&D) intensity (technological content of exports). From 1990 to 2024, the number of products exported to the United States increased by 5 percent, led by Aruba, Belize, Guyana, and Montserrat. Depth of diversification varied across countries and declined slightly over the region, reflecting continued heavy concentration in methanol and energy products, as well as textiles and apparel. From 1990–94 to 2020–24, exports under the CBERA program shifted toward higher R&D intensity products. The number of export products in the high, medium-high, and medium R&D intensity categories increased from 569 to 935, with high-R&D-intensity exports more than doubling, driven primarily by other mining and manufactured goods. Countries including Belize, Aruba, and Dominica notably shifted toward higher-tech exports. The CBERA program, particularly the HOPE and HELP Acts, has supported Haiti's export diversification by fostering the growth of its apparel industry through preferential access to the U.S. market. Human capital, quality of institutions, cost of compliance, infrastructure, and trade liberalization

⁷ See, e.g., U.S. Congress, House of Representatives, Committee on Ways and Means, *Statement of Sam Segnar*, 97th Congress, March 23, 1982, 134–35.

were among the main factors influencing the degree to which beneficiaries could diversify their exports under CBERA.

Impact on Total Exports and GDP

According to the Commission's model, CBERA boosted total export revenue from the top 20 products across all beneficiary countries by \$348.0 million in 2024—a 27.9 percent increase over what would have occurred without CBERA. The model indicates that the program significantly raised Haiti's apparel exports, increasing them by 148.9 percent. Trinidad and Tobago was the only exporter of petroleum products under CBERA, but the value of the benefit was negligible because the NTR tariff is modest for these products. In contrast, the model indicates that Trinidad and Tobago increased its chemical exports by 8.4 percent and its food manufacturing exports by 31.2 percent—the largest sectoral increase among all CBERA countries. The model indicates that Jamaica increased its food manufacturing exports by 17.9 percent because of CBERA. Although model estimates indicate CBERA led to short-run GDP gains of less than 0.1 percent for most beneficiary countries, Haiti's GDP rose by a notable 1.6 percent because of CBERA.

Chapter 1 Introduction

This report contains the assessment by the U.S. International Trade Commission (USITC or Commission) of the economic impact of the Caribbean Basin Economic Recovery Act (CBERA) program on the U.S. economy, imports, industry, and consumers as well as on the economies of CBERA beneficiary countries during 2023–24. In 2023–24, the economic impact of the CBERA program on U.S. industries and consumers continued to be small, primarily because the value of U.S. imports under the program was small compared to total U.S. imports—less than 0.1 percent. For the same period, the Commission's model estimates that the CBERA program increased U.S. imports and slightly decreased consumer prices. 9

This chapter describes the scope and approach, organization, and sources of information of the report. The overview presents the CBERA program (first implemented on January 1, 1984), including beneficiaries and eligibility requirements, trade benefits, and qualifying rules of origin. ¹⁰ The chapter also covers amendments to CBERA that have expanded the original preference program, including the Caribbean Basin Trade Partnership Act (CBTPA, authorized in 2000 and reauthorized in 2020), the Haitian Hemispheric Opportunity through Partnership Encouragement Acts of 2006 (HOPE I) and 2008 (HOPE II) (jointly referred to as the HOPE Acts), the Haiti Economic Lift Program Act of 2010 (HELP Act), and the Trade Preferences Extension Act of 2015. ¹¹ Throughout this report—the 27th in the series—the term "CBERA program" refers to CBERA as amended by these acts.

⁸ Throughout this report, the term "CBERA beneficiary" or "CBERA beneficiary country" refers to a country or territory for which a proclamation is in effect, designating it as a beneficiary. CBERA, Beneficiary Country, 19 U.S.C. § 2702(a)(1)(A). The 17 CBERA beneficiaries at year-end 2024 were Antigua and Barbuda, Aruba, The Bahamas, Barbados, Belize, the British Virgin Islands, Curacao, Dominica, Grenada, Guyana, Haiti, Jamaica, Montserrat, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, and Trinidad and Tobago. USITC, *HTS* (2025) Revision 3, General Note 7(a), March 2025.

⁹ The average change in value of U.S. imports of CBERA-eligible products from CBERA beneficiaries was 106.4 percent; the average change in consumer prices was −0.3 percent (see tables 3.3 and 3.4 for more on percentage changes in imports and prices).

¹⁰ For a summary of the initial implementation of the CBERA program, see USITC, *CBERA 1986*, September 1986. "CBERA-eligible products" are products eligible for preferences under the CBERA program (CBERA, CBERA as amended, CBTPA, HOPE/HELP). For CBERA-eligible products to receive duty-free treatment, the importer must claim the preference and the product must meet certain country of origin rules and other requirements as discussed in chapter 1 of this report. Eligibility is country-specific in addition to being product-specific. CBTPA beneficiaries are also a subset of CBERA beneficiaries. For a full list of specific CBERA beneficiary countries that were eligible for specific CBERA program preferences, see the section on "Beneficiaries and Eligibility" in chapter 1. Throughout the report, the terms "imports under CBERA," "imports under the CBERA program," and "CBERA imports" refer to CBERA-eligible products that claim preference under the CBERA program.

¹¹ Preferences provided in the CBTPA and the HOPE and HELP Acts have expiration dates, as detailed in the Summary of the CBERA Program section that follows and in table 1.1.

Scope and Approach of the Report

This report assesses the economic impact of the CBERA program on U.S. industries and consumers and on beneficiary countries for 2023 and 2024. The Commission's report includes an assessment of the effect of the CBERA program on the U.S. economy generally—as well as on those specific domestic industries that produce articles that are like, or directly competitive with, articles being imported into the United States from beneficiary countries. ¹³

This report assesses the economic impact of the CBERA program on U.S. consumers and U.S. industries by estimating the effects of the United States providing duty-free treatment for eligible goods. In addition, this report assesses the effects of the CBERA program on U.S. industry employment and profitability. ¹⁴ This assessment was made by comparing actual 2024 market conditions with a hypothetical case in which normal trade relations duties were imposed on CBERA program imports for 2024. ¹⁵ The effect of duty-free treatment of U.S. imports entered under the CBERA program in 2024 on most U.S. industries and U.S. consumers is estimated to be small.

As originally enacted in 1983—and as amended—CBERA authorizes the President to provide duty-free treatment or other preferential treatment for all eligible articles from any beneficiary country in accordance with the provisions of the act. ¹⁶ In general, the direct effect on the U.S. economy of such a duty elimination would be expected to generate increased U.S. imports from beneficiary countries, resulting from a diversion of trade from other countries to take advantage of lower duties in the U.S. market. The effect is likely to have occurred within a short period (a year or two) after the duty elimination. Forty years later, therefore, this effect may have been fully realized for the CBERA program.

Over a longer period, the effects of the CBERA program are expected to result from investment in industries in beneficiary countries that benefit from the duty-free treatment, creating opportunities to grow production and expand exports to the United States. The small size of the CBERA beneficiaries' economies relative to the U.S. economy limits both short-term and long-term effects on the U.S. economy.¹⁷ The long-term effects are difficult to distinguish from other market forces in play from the date the program was implemented. As in past CBERA reports, the Commission has tracked investment to detect trends in its sectoral composition and regional pattern.

¹² 19 U.S.C. § 2704(a)(1).

¹³ 19 U.S.C. § 2704(b)(1).

¹⁴ Because of data availability and the development of appropriate analytical tools, the Commission has been able to extend the partial equilibrium model used to estimate effects on employment and profit margins for the previous four reports. USITC, *CBERA 2017*, September 2017; USITC, *CBERA 2019*, September 2019; USITC, *CBERA 2023*, September 2023.

¹⁵ Normal trade relations (NTR) status was formerly known as most-favored-nation (MFN) status; MFN is the term commonly used outside the United States. Goods from a country with NTR status are entitled to normal nondiscriminatory tariff treatment. USITC, *HTS* (2025) Revision 3, General Note 3(a)(ii), March 2025.

¹⁶ CBERA, Pub. L. No. 98-67, §§ 211–218, 97 Stat. 369, 384–98 (2020) (codified as amended at 19 U.S.C. § 2701 et seq.).

¹⁷ U.S. imports under the CBERA program account for a small share of total U.S. imports; in 2024, they represented 0.06 percent (see <u>table 1.1</u>).

The Commission has assessed the economic impact of the CBERA program in 2023–24 on the U.S. economy generally and on specific U.S. industries producing articles that are like or directly competitive with articles imported under the CBERA program. The Commission assessed this impact in three key ways. First, the Commission analyzed imports that entered under the program and trends in the ratio of those imports to CBERA-eligible imports and overall U.S. imports from CBERA beneficiaries. Second, using a partial equilibrium model, the Commission estimated the effect of the CBERA program on U.S. imports, consumers, and industries competing with the leading U.S. imports that benefited from the CBERA program in 2024. Third, the Commission examined trends in production in any U.S. industry identified as likely to be particularly affected by such imports, including industries that compete with the imported products and industries that provide upstream inputs used in the production of the imported products.

In examining the impact of the CBERA program on the economies of the beneficiary countries, the Commission considered CBERA's goals of encouraging economic growth, economic development, and export diversification in beneficiary countries. For example, the CBERA program usage, including a discussion of utilization rates, and export diversification in the region are discussed in chapter 4. That chapter examines the extent to which CBERA beneficiaries have diversified their exports under the CBERA program and used the production of CBERA-eligible exports as part of an overall strategy for attaining sustainable economic growth.

To analyze imports under the CBERA program and their trends, the assessment focused on the 20 leading products that benefited from CBERA program tariff preferences in 2024, including both CBERA-exclusive and CBERA-nonexclusive products (see chapter 3). ¹⁸ Further analysis was devoted to industries in the United States that produce like, or directly competitive, products as exports from producers in CBERA beneficiary countries. As in previous reports, a single U.S. industry—methanol—met that criterion in 2024 (see chapter 2).

In assessing the probable future effect of the CBERA program, the Commission used a qualitative analysis of economic trends and investment patterns in beneficiary countries and in competing U.S. industries. Information on investment in CBERA-region production facilities was obtained mainly from sources such as the International Monetary Fund (IMF) and the World Bank, as well as from testimony provided at the Commission hearing held on February 20, 2025. ¹⁹

¹⁸ "CBERA-exclusive" imports are imports of products that can receive preferential entry only under the CBERA program. Almost all CBERA-exclusive products are textile and apparel products claiming benefits under the Haiti HOPE/HELP program. "CBERA-nonexclusive" imports are imports of products that entered the United States under the CBERA program but were also eligible for entry under the Generalized System of Preferences (GSP). Before authorization of the GSP program expired December 31, 2020, 10 CBERA countries also qualified for the GSP program. Although 2020 falls within the scope of this report, the prominence of the GSP program in this report has been reduced because of the length of this lapse. Following past lapses of GSP authorization, laws renewing the President's authority to grant duty-free treatment under GSP allowed importers to apply for refunds of duties if the article was otherwise eligible for GSP and the importer had claimed the GSP preference at the time of entry. Thus, during 2024, importers had the option of claiming GSP preferences in the event the GSP program is renewed with retroactive relief.

¹⁹ A list of witnesses appearing at the hearing is presented in appendix C of this report.

Organization of the Report

Chapter 1 describes the analytical approach used in the report and provides an overview of the CBERA program, including amendments made to the original CBERA by subsequent laws. Chapter 2 gives an overview of U.S. imports under the CBERA program during 2020–24. Chapter 3 reports on the economic impact of the CBERA program on U.S. industries with a focus on the two-year period covered by the biennial report (in this case, 2023–24). This chapter also includes the Commission's assessment of the probable future effect of the CBERA program on the U.S. economy generally, on specific domestic industries producing similar or directly competitive articles, and the indirect benefits to U.S. yarn and fabric industries that supply inputs to CBERA producers of apparel for the U.S. market. Lastly, chapter 3 features an estimate of the effects of CBERA on U.S. consumers.

Chapter 4 contains the Commission's analysis of the impact of the CBERA program on the economies of the beneficiary countries, with a focus on the beneficiary industries that have made greatest use of the program. This chapter also provides an assessment of the probable future effect of the CBERA program on the beneficiary countries.

Appendix A reproduces the notice that the Commission published in the *Federal Register* by which it announced a public hearing to be held on February 20, 2025, and invited public comment for this 27th report. Appendix B explains the economic model used to estimate the effect of the CBERA program on the U.S. economy, as presented in chapter 3. Appendix C includes a list of the witnesses who appeared at the public hearing. Appendix D presents a list of submissions and summaries filed with the Commission in response to the *Federal Register* notice regarding the investigation. Appendix E provides data used for figures presented in the report. Appendix F includes statistical tables of imports for consumption.

Sources

General economic and trade data come from official statistics of the U.S. Census Bureau (Census) and from information developed by country/regional and industry analysts at the Commission. Because this report incorporates official revisions of data from Census, data may differ somewhat from those in previous CBERA reports and other Commission reports.

Other sources of information include testimony and statements submitted for the Commission's hearing; reports by other U.S. government departments and offices, including the U.S. Department of Commerce and the U.S. Department of State; reports by international nongovernmental organizations, including the Inter-American Development Bank, the IMF, the United Nations (UN), the UN Conference on Trade and Development (UNCTAD), the Organisation for Economic Co-operation and Development (OECD), and the World Bank; official government sources in the CBERA beneficiary countries; and other published sources of information on CBERA program-related investment, production, and exports. The report also incorporates information provided in written public submissions received in response to the Commission's Federal Register notice of the investigation.

Summary of the CBERA Program

The CBERA program authorizes the President to grant duty-free or other preferential treatment for qualifying articles from CBERA beneficiaries. The following subsections describe CBERA program provisions concerning beneficiaries, trade benefits, and qualifying rules. CBERA has been amended and expanded over time through provisions added by the CBTPA and the HOPE and HELP Acts. The CBERA program therefore refers to the provisions of CBERA as amended by the CBTPA and the HOPE and HELP Acts, which are also described below. Table 1.1 summarizes the history and major provisions of the CBERA program.

Table 1.1 Summary of the CBERA program, year-end 2024

Characteristic	Description
History	As originally enacted, CBERA went into effect on 1/1/1984. The Caribbean Basin Economic Recovery Expansion Act of 1990 expanded and made the CBERA program permanent on 8/20/1990. The CBTPA created enhanced benefits for countries meeting additional eligibility criteria on 5/18/2000. The CBTPA was extended on 5/22/2008, 5/24/2010, and 10/10/2020. HOPE I created enhanced benefits for Haiti on 12/20/2006. The HOPE II and HELP Acts further enhanced these Haiti benefits on 5/22/2008 and 5/24/2010, respectively. The HOPE and HELP Acts were last extended on 6/29/2015. ^a
Benefits	Duty-free or reduced-duty entry granted on a nonreciprocal, non- NTR basis.
Eligibility criteria for beneficiary countries	CBERA has mandatory criteria addressing issues of governance, economic policy, and taking steps to provide internationally recognized worker rights, as well as discretionary criteria on economic conditions, World Trade Organization commitments, and intellectual property. The CBTPA added new eligibility criteria on U.S. counter-narcotics policies, anti-corruption, government procurement policies, and customs procedures. The HOPE and HELP Acts require that Haiti has established, or is making continual progress, on eligibility criteria covering governance, economic policy, and internationally recognized worker rights. The HOPE/HELP programs also have a requirement that individual producers participate in a labor-monitoring program. ^b
Duration (of trade benefits)	CBERA is non-expiring. The CBTPA: until 9/30/2030. The HOPE and HELP Acts: until 9/30/2025.
Beneficiaries	Seventeen beneficiaries under CBERA in 2024: Antigua and Barbuda, Aruba, The Bahamas, Barbados, Belize, the British Virgin Islands, Curacao, Dominica, Grenada, Guyana, Haiti, Jamaica, Montserrat, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, and Trinidad and Tobago. Eight beneficiaries under the CBTPA in 2024: Barbados, Belize, Curacao, Guyana, Haiti, Jamaica, Saint Lucia, and Trinidad and Tobago. Haiti is the lone beneficiary under HOPE and HELP. ^d
Coverage (eligible products)	5,674 HTS 8-digit tariff lines under CBERA and another 259 under the CBTPA.
Value of imports under the program U.S. imports under the CBERA program as a share of total U.S. imports for consumption	\$1.84 billion (2024). 0.06 percent (2024).
U.S. imports from beneficiaries that receive program preferences as a share of total U.S. imports from beneficiary countries	15.8 percent (2024).

Source: Compiled by the USITC.

a. CBERA, Pub. L. No. 98-67, §§ 211–218, 97 Stat. 369, 384–98 (2020); CBEREA, Pub. L. No. 101-382, §§ 211–227, 104 Stat. 629, 655–661 (1990), 101; CBTPA, Pub. L. No. 106-200, §§ 211–213, 114 Stat. 251, 276–288 (2000), 106; HOPE I, Pub. L. No. 109-432, 120 Stat. 2922, §§ 5001–5006 (2006); HOPE II, Pub. L. No. 110-234, 122 Stat. 1527, §§ 15401–15422 (2008); HELP Act, Pub. L. No. 111-171, §§ 1–10, 124 Stat. 1194–1208 (2010), 111; Trade Preferences Extension Act of 2015, Extension of Preferential Duty Treatment Program for Haiti, Pub. L. No. 114-27, § 301, 129 Stat. 362, 373 (2015); Extension of the Caribbean Basin Economic Recovery Act, Pub. L. No. 116-164, §§ 1–4, 134 Stat. 758 and 759 (2020).

b. 19 U.S.C. § 2702; 19 U.S.C. § 2703a(d) & 2703a(e).

c. 19 U.S.C. § 2703(b)(2)(A)(iii)(II)(cc) & (b)(5)(D)(i); 19 U.S.C. § 2703a(h).

d. USITC, HTS (2025) Revision 3, General Note 7(a), March 2025; USITC, HTS (2025) Revision 3, General Note 17(a), March 2025.

Beneficiaries and Eligibility

To be eligible for tariff preferences under CBERA, a CBERA country or territory must be designated as a beneficiary. The 17 countries and territories listed in <u>table 1.1</u>, above, are currently designated as CBERA beneficiaries.²⁰ Imports from these 17 countries and territories were eligible for CBERA tariff preferences during 2023–24.²¹ The President may separately designate CBERA beneficiaries for CBTPA preferences.²² During 2023–24, eight countries, listed in <u>table 1.1</u>, were designated as CBTPA beneficiaries.²³

Both CBERA and the CBTPA have eligibility conditions and other factors the President must consider when designating beneficiaries, with the CBTPA requiring that beneficiaries satisfy eligibility criteria under both programs. ²⁴ The President has delegated to the U.S. Trade Representative (Trade Representative) the authority to designate beneficiary countries under the CBERA program. ²⁵

Haiti-specific preferences under HOPE I, HOPE II, and HELP have additional eligibility requirements, including that individual textile and apparel producers comply with core labor standards. ²⁶ Consistent with these requirements, Haiti has established a labor capacity-building and monitoring program known as the Technical Assistance Improvement and Compliance Needs Assessment and Remediation (TAICNAR) Program. ²⁷ Producers in Haiti seeking preferential treatment for their exports to the United States must participate in this TAICNAR Program, and the Office of the U.S. Trade Representative (USTR) issues annual reports on the eligibility of individual producers for the Haiti benefits. ²⁸

²⁰ USITC, *HTS* (2025) Revision 3, General Note 7(a), March 2025. Ten current CBERA beneficiary countries are also beneficiaries under the Generalized System of Preferences (GSP), which similarly allows beneficiary countries to receive duty-free treatment for eligible articles. USITC, *HTS* (2025) Revision 3, General Note 4(a), March 2025. Importers of goods that are eligible for duty-free treatment under both programs have the option to enter goods under either program (but not both), although the President's authority under the GSP program expired on December 31, 2020. 19 U.S.C. § 2465. For a comparison of the CBERA and GSP programs, see USITC, *CBERA* 2023, September 2023, 34–36.

²¹ For requirements and considerations for eligibility and designation, and a list of countries eligible for designation, see 19 U.S.C. § 2702(b). Countries and territories that are eligible but not designated as CBERA beneficiaries are Anguilla, the Cayman Islands, Sint Maarten, Suriname, and the Turks and Caicos Islands. Countries that have entered into a free trade agreement with the United States are ineligible for the CBERA program. 19 U.S.C. § 2702 note (listing termination date for CBERA countries that have entered into FTA with United States).

²² 19 U.S.C. § 2703(b)(5)(B).

²³ Throughout this report, the term "CBTPA beneficiary" refers to a country or territory that is a CBERA beneficiary and for which a proclamation designating it as a beneficiary under the CBTPA is also in effect. 19 U.S.C. § 2703(b)(5)(B).

²⁴ 19 U.S.C. § 2702(b-c); 19 U.S.C. § 2703(b)(5)(B). For further discussion on the eligibility criteria, see USITC, *CBERA* 2023, September 2023, 29–32.

²⁵ Proclamation 7351, 65 Fed. Reg. 59329 (October 4, 2000).

²⁶ 19 U.S.C. § 2703a(d) & 2703a(e).

²⁷ 19 U.S.C. § 2703a(e)(1), (3).

²⁸ 19 U.S.C. § 2703a(e)(1–2). For USTR's most recent report, see USTR, USTR Annual Report on the Implementation of the TAICNAR Program, June 18, 2024.

Trade Benefits under CBERA and the CBTPA

CBERA provides duty-free or reduced-duty treatment to qualifying imports from designated beneficiary countries. ²⁹ The CBTPA amended CBERA to authorize duty-free treatment for additional products that had originally been excluded from CBERA, such as certain apparel articles. ³⁰ The CBTPA also authorizes treatment equivalent to that given to Mexico under the United States-Mexico-Canada Agreement (USMCA) for certain import-sensitive articles otherwise excluded from CBERA, such as petroleum products. ³¹ Among *Harmonized Tariff Schedule of the United States* (HTS) 8-digit subheadings, 5,674 are covered by CBERA trade preferences, and an additional 259 are covered under the CBTPA. ³²

Qualifying Rules of Origin

To receive tariff preferences under the CBERA program, eligible products must be imported directly from a beneficiary country³³ and either be (1) wholly grown, produced, or manufactured in a designated CBERA beneficiary or (2) "new or different" articles made from substantially transformed non-CBERA inputs in a designated CBERA beneficiary.³⁴ In addition, the cost or value of the local materials (i.e., materials produced in one or more CBERA beneficiaries) used to make the product—plus the direct cost of processing in one or more CBERA beneficiaries—must total at least 35 percent of the appraised customs value of the product at the time of entry.³⁵ Inputs from Puerto Rico, the U.S. Virgin Islands, and

²⁹ CBERA generally applies to all products, with only certain enumerated products exempted or conditioned. 19 U.S.C. § 2703(a)(1) ("unless otherwise excluded from eligibility by this chapter . . . the duty-free treatment provided under this chapter shall apply to any article which is the growth, product, or manufacture of a beneficiary country"). The Caribbean Basin Economic Recovery Expansion Act of 1990 (CBEREA) authorized the President to proclaim reduced duty rates for import sensitive items, such as leather handbags and luggage, that had initially been excluded from duty-free treatment under CBERA. See CBEREA, Duty Reduction for Certain Leather-Related Products, Pub. L. No. 101-382, § 212, 104 Stat. 629, 655–656 (1990). Proclamation 6428, 57 Fed. Reg. 19363 (May 6, 1992). Imports of sugar and beef must meet additional statutory conditions to qualify for duty-free entry. 19 U.S.C. §§ 2703(c)(1)(B) (requirements for plan) & 2703(c)(2) (conditioning duty-free treatment of sugar and beef on Presidential review of plan). HTS general note 3(c) enumerates the products of covered countries that are eligible for special tariff treatment under various U.S. trade programs, including CBERA. HTS general note 7 covers CBERA in detail. USITC, *HTS* (2025) Revision 3, General Note 7(a), March 2025.

³⁰ 19 U.S.C. § 2703(b)(2)(A).

³¹ 19 U.S.C. § 2703(b)(3)(A). For most goods excluded from CBERA as import-sensitive articles, the CBTPA provides for the application of Mexico's special rates of duty under the USMCA, where goods from CBTPA countries meet USMCA ROOs. The exceptions are agricultural and textile/apparel products. Certain apparel and nonapparel textile products, such as textile luggage, made from U.S. inputs are eligible for duty-free entry. For more information, see subchapter XX (20) of HTS chapter 98.

³² USITC, 2023 Harmonized Tariff Schedule of the United States (HTS) Item Count, accessed May 23, 2023.

³³ For Haiti's special preferences, HOPE II amended this requirement by allowing for shipments from Haiti or the Dominican Republic through an intermediary country to the United States to be considered direct shipments. 19 U.S.C. § 2703a(a)(5).

³⁴ Certain products that undergo simple combining or packaging operations, or dilution with substances, do not qualify for duty-free entry into the United States. 19 U.S.C. § 2703(a)(2); 19 C.F.R. § 10.195(a)(2). However, articles that are not textiles and apparel or petroleum and petroleum products and that are assembled or processed in CBERA beneficiary countries wholly from U.S. components or materials are eligible for duty-free entry under note 2 to subchapter II, chapter 98, of the HTS.

³⁵ 19 U.S.C. § 2703(a)(1)(B); 19 C.F.R. §§ 10.196–10.197.

former CBERA beneficiaries may count toward the 35 percent value threshold.³⁶ Apparel articles under the CBTPA and HOPE/HELP preferences have further rules of origin (ROOs), detailed below.

Caribbean Basin Trade Partnership Act

The CBTPA authorizes duty-free treatment for imports of qualifying cotton, wool, and manmade-fiber apparel from CBTPA beneficiary countries.³⁷ For the most part, qualifying apparel goods under the CBTPA must be made wholly of U.S. or CBERA-regional inputs (i.e., inputs from CBERA beneficiary countries) and assembled in a CBTPA beneficiary country.³⁸ CBTPA preferences are time limited and currently set to expire on September 30, 2030.³⁹ Table 1.2 presents textiles and apparel made in CBTPA beneficiary countries that are eligible for duty-free entry under the CBTPA and the criteria they must meet to receive those benefits. The table summarizes each apparel type and its HTS code in the first column (e.g., textile luggage, folklore articles, etc.), and preferential treatment available under the CBTPA in the second column (e.g., unlimited duty-free treatment, caps for preferential treatment, etc.). Table 1.3 summarizes requirements concerning origin of inputs and processes, value added, and quantitative limits for different types of apparel to receive preferential treatment. For example, table 1.3 illustrates that for T-shirts to receive preferential treatment under the CBTPA, the yarn must be of U.S. origin and fabric, cutting, and assembly must occur within the CBTPA region. In addition, the agreement establishes quantitative limits on preferential treatment.

³⁶ 19 U.S.C. § 2703(a)(1)(B). "Former beneficiary country" refers to those countries that are no longer a beneficiary country under CBERA because of entering into a free trade agreement with the United States. 19 U.S.C. § 2702(a)(1)(F). In 2024, former beneficiaries were El Salvador, Guatemala, Honduras, Nicaragua, the Dominican Republic, Costa Rica, and Panama. 19 U.S.C. § 2702 note. To encourage production sharing between Puerto Rico and CBERA beneficiary countries, CBERA allows duty-free entry for articles produced in Puerto Rico that are "by any means advanced in value or improved in condition" in a CBERA beneficiary country, easing the substantial transformation requirement. 19 U.S.C. § 2703(a)(5). Imports entered under the "Puerto Rico-Caribbean Basin Initiative (CBI)" coding are counted in this report as having entered under the original CBERA. See chapters 2 and 3 for additional information.

³⁷ As noted above, CBTPA beneficiaries may also receive equivalent tariff rates given to Mexico under the USMCA for import-sensitive articles otherwise excluded from CBERA and these products must comply with ROOs requirements under the USMCA. 19 U.S.C. § 2703(b)(3)(A).

³⁸ 19 U.S.C. § 2703(b)(2)(A). The CBTPA also provides duty-free treatment for textile luggage assembled from U.S. fabrics made of U.S. yarns. 19 U.S.C. § 2703(b)(2)(A)(viii).

³⁹ 19 U.S.C. § 2703(b)(2)(A)(iii)(II)(cc) and (b)(5)(D)(i).

Table 1.2 Textiles and apparel made in CBTPA beneficiary countries that are eligible for duty-free entry under the CBTPA

CBTPA = Caribbean Basin Trade Partnership Act; HTS = Harmonized Tariff Schedule of the United States.

Brief description of article, with HTS code	Brief description of criteria and related information
Apparel assembled from U.Sformed and -cut fabric (HTS 9802.00.8044); apparel assembled from U.Sformed and -cut fabric that underwent further processing, such as embroidering or stone-washing (HTS 9820.11.03)	Unlimited duty-free treatment. Fabric must be made wholly of U.S. yarn and cut or knit to shape in the United States. Fabric, whether knit or woven, must be dyed, printed, and finished in the United States.
Apparel cut and assembled from U.S. fabric, knit and woven (HTS 9820.11.06); apparel cut and assembled from U.S. fabric, knit (HTS 9820.11.18)	Unlimited duty-free treatment. Fabric must be made wholly of U.S. yarn. Fabric, whether knit or woven, must be dyed, printed, and finished in the United States. Apparel must be sewn together with U.S. thread.
Certain apparel of "regional knit fabrics" includes apparel knit to shape directly from U.S. yarn (other than socks) and knit apparel cut and assembled from regional fabrics or regional and U.S. fabrics; knit apparel except outerwear T-shirts (HTS 9820.11.09); outerwear T-shirts (HTS 9820.11.12)	Fabric must be made wholly of U.S. yarn. Preferential treatment is subject to the following caps: HTS 9820.11.09: 970 million square meter equivalents (SMEs); HTS 9820.11.12: 12,000,000 dozen.
Brassieres cut and assembled in the United States or the region from U.S. fabric (HTS 9820.11.15)	Producer must satisfy a rule that at least 75 percent of the value of the fabric contained in the firm's brassieres in the preceding year was attributed to fabric components formed in the United States. (The 75 percent standard rises to 85 percent for a producer found by the U.S. Customs Bureau to have not met the 75 percent standard in the preceding year.)
Textile luggage assembled from U.Sformed and -cut fabric (HTS 9802.00.8046) or from U.Sformed fabric cut in eligible CBTPA countries (HTS 9820.11.21)	Fabric must be made wholly of U.S. yarn.
Apparel cut and assembled in eligible CBTPA countries, otherwise deemed to be "originating goods" under then applicable rules of origin (such as are now found in HTS general note 11(o) for the USMCA) but containing fabrics or yarns determined under Annex 4-B to the USMCA as being not available in commercial quantities (in "short supply") in the United States (HTS 9820.11.24)	The fabrics and yarn include fine-count cotton knitted fabrics for certain apparel; linen; silk; cotton velveteen; fine-wale corduroy; Harris Tweed; certain woven fabrics made with animal hairs; certain lightweight, high-thread-count polyester/cotton woven fabrics; and certain lightweight, high-thread-count broadwoven fabrics used in production of men's and boys' shirts.
Apparel cut and assembled from additional fabrics or yarns designated as not available in commercial quantities in the United States (HTS 9820.11.27)	On request of an interested party, the President may proclaim preferential treatment for apparel made from additional fabrics or yarn if the President determines that such fabrics or yarn cannot be supplied by the domestic industry in commercial quantities in a timely manner.
Handloomed, handmade, or folklore articles (HTS 9820.11.30)	Must be certified as such by exporting country under an agreement with the U.S. Department of Commerce Office of Textiles and Apparel (OTEXA).

Source: 19 U.S.C. § 2703(b)(2)–(5).

Table 1.3 The CBTPA: requirements concerning origin of inputs and processes, value added, and quantitative limits

					Value	Quantitative
Article	Yarn	Fabric	Cutting	Assembly	added	limit
Other apparel	U.S.	U.S.	U.S./CBTPA	CBTPA	No	No
Knit apparel	U.S.	U.S./CBTPA	CBTPA	CBTPA	No	Yes
T-shirts	U.S.	CBTPA	CBTPA	CBTPA	No	Yes
Brassieres	Any country	U.S. (at least 75%)	U.S./CBTPA	U.S./CBTPA	No	No
Textile luggage	U.S.	U.S.	U.S./CBTPA	CBTPA	No	No
Apparel of yarns/fabrics in short supply	Any country	Any country	СВТРА	СВТРА	No	No

Source: USITC, HTS (2025) Revision 3, March 2025, chapter 98, subchapter XX, U.S. note 2.

HOPE and HELP Acts

Since 2006, the CBERA program has been amended three times to expand and enhance trade benefits for certain apparel produced in Haiti and to give Haitian apparel producers more flexibility in sourcing yarns and fabrics than previously possible. The amendments creating Haiti's preferences were the Haitian Hemispheric Opportunity through Partnership Encouragement Act of 2006 (HOPE I), the Haitian Hemispheric Opportunity through Partnership Encouragement Act of 2008 (HOPE II), and the Haiti Economic Lift Program Act of 2010 (HELP Act). 40 HOPE I provided duty-free treatment for a limited amount of apparel produced in and imported from Haiti with more flexible sourcing rules than under the CBTPA, HOPE II provided simplified rules for Haitian producers to qualify for duty-free treatment, and HELP expanded these programs and created new preferences. 41 The preferential access provided under the HOPE and HELP Acts expires on September 30, 2025. 42 Table 1.4 summarizes the requirements for certain apparel articles to receive preferences under the HOPE and HELP Acts.

⁴⁰ HOPE I, Pub. L. No. 109-432, 120 Stat. 2922, §§ 5001–5006 (2006); HOPE II, Pub. L. No. 110-234, 122 Stat. 1527, §§ 15401-15422 (2008); HELP Act, Pub. L. No. 111-171, §§ 1-10, 124 Stat. 1194-1208 (2010). These acts are codified at 19 U.S.C. § 2703a.

⁴¹ Most HOPE and HELP provisions provide special rules and not preferential treatment for additional tariff lines; these products enter under HTS chapter 98. New preferences created by the HELP Act included unlimited duty-free treatment for certain knit apparel and homegoods, increases in tariff preference levels for certain knit and woven apparel, and increases the earned import allowance requirement for apparel wholly assembled in Haiti with inputs from any origin. For a summary of the evolution of the preferences under these programs, see USITC, CBERA 2023, September 2023, 39–42.

⁴² 19 U.S.C. § 2703a(h).

Table 1.4 HOPE and HELP Acts: requirements concerning origin of inputs and processes, value added and quantitative limits

						Quantitative
Article	Yarn	Fabric	Cutting	Assembly	Value added	limit
Other apparel	Any country	Any country	Any country	Haiti	50% or more beneficiary country content	Yes
Knit apparel	U.S.	Any country	Any country	Haiti	No	Yes
Woven apparel	Any country	Any country	Any country	Haiti	No	Yes
Brassieres	Any country	Any country	Haiti	Haiti	No	No
Certain nonapparel textile goods (luggage, towels, bedspreads and quilts, headgear)	Any country	Any country	Haiti	Haiti	No	No
Apparel of yarns/fabrics in short supply	Any country	Any country	Haiti	Haiti	No	No

Source: USITC, HTS (2025) Revision 3, March 2025, chapter 98, subchapter XX, U.S. note 6 (j)(ii).

Note: Under the HOPE and HELP Acts, certain types of knit apparel (e.g., men's and boys' T-shirts, all sweaters) do not qualify—generally they are given preferential treatment under the CBTPA. Brassieres and certain nonapparel textile goods (luggage and headgear) have no quantitative limits as long as they are wholly assembled or knit to shape in Haiti.

Chapter 2 U.S. Imports Under the CBERA Program by Country and Product

This chapter provides an overview of U.S. imports for consumption under the Caribbean Basin Economic Recovery Act (CBERA) program during the past five years.⁴³ The focus is on changes during 2023–24, the period since the Commission last published a report on the CBERA program.⁴⁴ Next, the chapter covers U.S. imports under the CBERA program by source countries. It further provides in-depth analysis of the main U.S. import products under the CBERA program: methanol and energy products, textiles and apparel, other mining and manufactured products, and agricultural products.

Overall U.S. Imports from CBERA Beneficiaries

The value of U.S. imports from CBERA beneficiaries (including U.S. imports under the CBERA program, U.S. imports of CBERA-eligible products in which preferences were not claimed, and imports from CBERA beneficiaries of products not eligible under the CBERA program) grew by almost \$6.6 billion, from \$5.1 billion in 2020 to \$11.6 billion in 2022. Import values fell by \$1.9 billion from \$11.6 billion in 2022 to \$9.7 billion in 2023, and then rebounded in 2024 to \$11.6 billion (see table 2.1). After a decline in 2020 due to the onset of the COVID-19 pandemic, U.S. imports from the CBERA region increased in 2021, driven by higher textiles and apparel imports from Haiti. The surge of U.S. imports in 2022 came mainly from U.S. imports from Guyana, The Bahamas, and Trinidad and Tobago's two product groups—methanol and energy, and other mining and manufactured products. U. S. imports of textiles and apparel from CBERA beneficiaries grew by \$260 million (34.7 percent) from \$750 million in 2020 to \$1.0 billion in 2021 and declined to \$590 million in 2024.

The value of CBERA-eligible imports increased to \$6.6 billion in 2024, a 20.5 percent increase from \$5.5 billion in 2022 and 160.9 percent increase from 2020. Most of this growth, however, was in imports that did not claim CBERA preferences; imports claiming CBERA program preferences fell by 34.5 percent from a peak of \$2.8 billion in 2022 to \$1.8 billion in 2024, just \$28 million more than the 2020 value.

During 2020–24, the value of U.S. merchandise imports from CBERA beneficiaries averaged \$9.3 billion per year, and the value of imports of CBERA-eligible products and imports under the CBERA program averaged \$4.9 billion and \$2.1 billion, respectively. As a result, on average, 52.6 percent of U.S.

⁴³ Throughout the report, the terms "imports under CBERA," "imports under the CBERA program," and "CBERA imports" refer to CBERA-eligible products that claim preference under the CBERA program.

⁴⁴ USITC, *CBERA 2023*, September 2023.

⁴⁵ For more information, see the discussion in chapter 2, "Textile and Apparel Products."

merchandise imports from CBERA beneficiaries were eligible for preferences under CBERA (<u>table 2.1</u>)⁴⁶ and on average, 43.2 percent of CBERA-eligible products—or a value of \$2.1 billion—were imported under CBERA during these five years.⁴⁷

Table 2.1 U.S. imports for consumption by year, 2020–24

In millions of dollars.

						Average imports
Program	2020	2021	2022	2023	2024	2020-24
CBERA, claimed	1,808	2,191	2,801	1,973	1,836	2,122
CBERA, did not claim	733	2,336	2,699	3,374	4,794	2,787
Total, CBERA eligible	2,541	4,526	5,500	5,348	6,629	4,908
Not CBERA eligible	2,548	4,152	6,140	4,344	4,956	4,429
Total merchandise						
imports from						
CBERA countries	5,089	8,678	11,640	9,691	11,585	9,337

Source: USITC DataWeb/Census, accessed February 10, 2025. Note: Because of rounding, figures may not add to totals shown.

U.S. Imports by Country Under the CBERA Program

U.S. imports for consumption under CBERA grew from 2020 to 2022 but declined in 2023 and 2024. The growth in U.S. imports for consumption under CBERA from 2020 to 2022 was driven by the exports of methanol and energy products from Trinidad and Tobago and Guyana, as well by apparel from Haiti. However, for other products, low normal trade relations (NTR) duty rates disincentivized claims for CBERA preferences. For example, the low NTR duty rates on crude oil and fuel oil discouraged importers from claiming CBERA preferences when purchasing energy products from CBERA-eligible countries.⁴⁸

⁴⁶ "CBERA-eligible products" are products eligible for preferences under the CBERA program. For CBERA-eligible products to receive duty-free treatment, the importer must claim the preference and the product must meet certain country of origin rules and other requirements as discussed in chapter 1. Eligibility is country specific in addition to being product specific. Some CBERA beneficiaries are also Caribbean Basin Trade Partnership Act (CBTPA) beneficiaries. For a full list of CBERA beneficiaries that were eligible during 2020–24 for specific CBERA program preferences, see the section on "Beneficiaries and Eligibility" in chapter 1. Throughout the report, the terms "imports under CBERA," "imports under the CBERA program," and "CBERA imports" refer to CBERA-eligible products that claimed preference under the CBERA program. Importers must claim the CBERA trade preference upon entry to the United States, a process that requires documentation. For some products, the availability of other tariff benefits or low permanent normal trade relations (NTR) duty rates (e.g., the ad valorum tariff rate for petroleum products is below 0.5 percent) may explain why CBERA preferences are not always claimed. ⁴⁷ The preference program utilization rate is calculated by dividing U.S. imports that claimed preferences under that program (i.e., received duty elimination or reduction) by imports of the universe of products that were covered by that program. The universe of products covered by the program comprises the products under Harmonized Schedule of the United States (HTS) subheadings that are eligible for program preferences. In the case of CBERA, as amended, three country groups have different products that are covered by the CBERA program (CBERA-eligible products). The three groupings consist of (1) beneficiaries of the original CBERA preferences; (2) beneficiaries of the original CBERA preferences plus the expanded CBTPA preferences; and (3) beneficiaries of the original CBERA preferences, the expanded CBTPA preferences, and the country-specific Haiti HOPE/HELP preferences (i.e., Haiti). For more detail, see the section "Program Usage" in chapter 4. ⁴⁸ For more information, see the discussion in chapter 2, "Methanol and Energy Products."

U.S. imports that entered under the CBERA program from most CBERA beneficiaries decreased in 2023 and 2024, with total imports under the program dropping 34.5 percent by value (table 2.2). The decline from 2022 to 2024 was due to the decrease of imports of textiles and apparel from Haiti and the decrease in imports of energy products from Trinidad and Tobago and Guyana. Imports under CBERA from Guyana—particularly petroleum oils—experienced the largest decline in percentage terms (96.9 percent) from 2022 to 2024. Imports under CBERA from Trinidad and Tobago, the largest source of imports for consumption under CBERA, grew by \$419 million (72.4 percent) from 2020 to 2024, though the majority of the increase occurred in 2020–22, followed by a modest decrease of 1.6 percent between 2022 and 2024. Imports under CBERA from Haiti, the second-largest source of imports for consumption under CBERA, decreased by a large margin (40.1 percent) from 2022 to 2024.

Table 2.2 U.S. imports for consumption under CBERA, by source and year, 2020–24 In millions of dollars and percentage change.

	2020	2021	2022	2023	2024	Percentage change
Source	(million \$)	2022–24				
Trinidad and Tobago	579	754	1,014	891	998	-1.6
Haiti	768	1,030	991	756	593	-40.1
Jamaica	109	123	134	142	131	-2.2
Bahamas	57	71	80	58	55	-31.1
Belize	15	16	21	15	32	54.9
Guyana	265	188	532	100	17	-96.9
Saint Kitts and Nevis	3	5	7	6	5	-29.0
Grenada	2	3	4	3	3	-28.3
Saint Lucia	1	1	1	1	0	-45.1
Barbados	8	1	1	1	0	-29.5
All other	14	9	29	11	9	-69.6
Total imports	1,808	2,191	2,801	1,973	1,836	-34.5

Source: USITC DataWeb/Census, accessed February 10, 2025.

Note: For the complete listing of beneficiary country imports for consumption under CBERA, see appendix table F.2.

Imports from Haiti—which are eligible for CBERA, Caribbean Basin Trade Partnership Act (CBTPA), Haitian Hemispheric Opportunity through Partnership Encouragement (HOPE) Acts, and Haiti Economic Lift Program (HELP) preferences—formerly constituted the largest share of U.S. imports under CBERA (42.5 percent in 2020) but decreased to 32.3 percent in 2024 (table 2.3). Although U.S. imports from Haiti—nearly all of which are apparel—decreased from 2023 to 2024, apparel imports from the rest of the world increased. Industry representatives attribute the decrease in imports to continued economic instability and gang violence in Haiti. Halt other import sources from CBERA beneficiaries not listed—Antigua and Barbuda, Aruba, the British Virgin Islands, Curacao, Dominica, Montserrat, and Saint Vincent and the Grenadines—varied greatly from 2020 to 2024. From 2020 to 2022, they experienced a large gain in percentage terms (101 percent) but declined by 69.6 percent from 2022 to 2024. As a

⁴⁹ For more information, see the discussions in chapter 2, "Methanol and Energy Products" and "Textile and Apparel Products."

⁵⁰ In 2020, imports from Guyana represented roughly half of *Harmonized Tariff Schedule of the United States* (HTS) subheading 2709.00.20 under CBERA (CBTPA) and half under no preference program. In 2024, imports from Guyana of HTS 2709.00.20 entered under no preference program. USITC DataWeb/Census, accessed April 2, 2025. ⁵¹ Apparel represents 99.4 percent of imports for consumption from Haiti. For more on Haitian imports, see <u>table</u>

^{2.5.} USITC, Hearing transcript, February 20, 2025, 50 (testimony of Beth Hughes, AAFA).

⁵² USITC, Hearing transcript, February 20, 2025, 55 (testimony of Beth Hughes, AAFA).

whole, U.S. imports for consumption under CBERA grew from 2020 to 2022 but declined in 2023 and 2024.

Table 2.3 U.S. imports for consumption under CBERA, by source and year, 2020–24 In percentages. — (em dash) = not applicable; ** = rounds to 0.0.

						Average import
Source	2020	2021	2022	2023	2024	share 2020-24
Trinidad and Tobago	32.0	34.4	36.2	45.1	54.4	40.4
Haiti	42.5	47.0	35.4	38.3	32.3	39.1
Jamaica	6.0	5.6	4.8	7.2	7.1	6.1
Bahamas	3.1	3.3	2.9	3.0	3.0	3.1
Belize	0.9	0.7	0.7	0.7	1.8	1.0
Guyana	14.7	8.6	19.0	5.1	0.9	9.7
Saint Kitts and Nevis	0.2	0.2	0.2	0.3	0.3	0.2
Grenada	0.1	0.1	0.1	0.2	0.2	0.1
Saint Lucia	**	**	**	**	0.0	**
Barbados	0.4	**	**	**	0.0	0.1
All other	0.8	0.4	1.0	0.6	0.5	0.7
Total imports	100.0	100.0	100.0	100.0	100.0	_

Source: USITC DataWeb/Census, accessed February 10, 2025.

Between 2020 and 2024, Haiti and Trinidad and Tobago were the two largest sources of imports under the CBERA program, with Trinidad and Tobago accounting for 54.4 percent in 2024 (table 2.3). Haiti accounted for 32.3 percent of the value of total U.S. imports under the CBERA program in 2024 and experienced a decline of \$175 million from 2020 to 2024. U.S. imports from Jamaica grew by 20 percent (\$22 million) from 2020 to 2024. From 2022 to 2024, the import share from Trinidad and Tobago grew by 18.2 percentage points, but imports from Haiti fell by 3.1 percentage points (table 2.3). Jamaica was the next-largest source of imports under the CBERA program in each of the last two years, with a fiveyear average of 6.1 percent of total U.S. imports that entered under the CBERA program. The import share from Jamaica grew by 2.4 percentage points from 2022 to 2024 (table 2.3). Guyanese imports under CBERA doubled in 2020–22; however, during the 2023–24 period, imports from Guyana fell dramatically by 83.0 percent (table 2.2). In 2024, Guyana moved down to the sixth-largest source of imports under CBERA from CBERA beneficiaries (table 2.3).

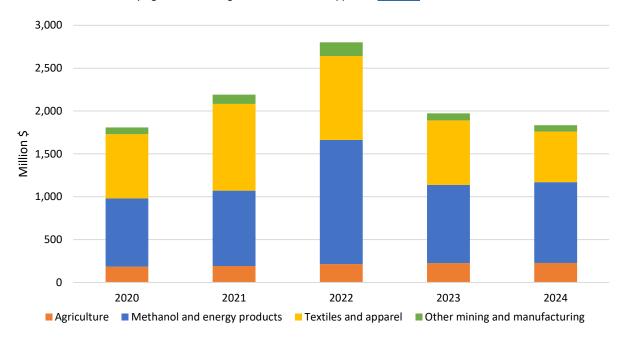
U.S. Imports by Product Under the CBERA Program

Imports under the CBERA program totaled \$1.8 billion in 2024, a decrease of \$965 million from 2022 and an increase of \$27 million from 2020. Imports of methanol and energy products (including methanol) averaged \$996 million during 2020-24 (figure 2.1), followed by textile and apparel products, at \$801 million; agricultural products, at \$209 million; and other mining and manufactured products, at \$115

million. 53 The import of energy products displaced textiles and apparel products as the largest U.S. import category from CBERA countries in 2022. During the 2020–24 period, energy products averaged 47.0 percent of imports under the CBERA program, textiles and apparel products averaged 37.8 percent, and agricultural products and other mining and manufactured products made up 9.8 percent and 5.4 percent, respectively.

Figure 2.1 U.S. imports under the CBERA program, by major product category, 2020–24

In millions of dollars. Underlying data for this figure can be found in appendix table E.2.



Source: USITC DataWeb/Census, accessed February 10, 2025.

Note: Agriculture products are imported under Harmonized Commodity Description and Coding System (HS) chapters 1-24; methanol and energy products are imported under HTS subheading 2905.11.20 (methanol) and under HS chapter 27 (other energy products); textile and apparel products are imported under HS chapters 50-63; mining and manufactured products are products not included under other major product categories.

Imports under the CBERA program rose between 2020 and 2022 and declined in 2023 and 2024. The decline in imports under the CBERA program since 2022 was driven by a dip in both methanol and energy products and textile and apparel imports. Imports of methanol and energy products increased between 2020 and 2022, reaching a peak of \$1.4 billion in 2022. This growth was largely driven by exports of crude oil from Guyana. However, the amount of crude oil claiming CBERA preferences fell, causing the imports of energy products under CBERA to fall by 36.9 percent in 2023 to \$914 million.⁵⁴ Methanol and energy product imports under CBERA rose by \$29 million in 2024, an increase of 3.2 percent from their level of 2023, but remained lower than the \$1.4 billion peak in 2022. Textile and

⁵³ Throughout the report, "methanol and energy products" is defined as goods imported under HTS subheading 2905.11.20 and products imported under HTS chapter 27. USITC DataWeb/Census, HTS subheading 2905.11.20, methanol other than for use in producing synthetic natural gas or for direct use as a fuel, and chapter 27, mineral fuels, accessed February 10, 2025. For more information, see discussion in chapter 2, "Methanol and energy products."

⁵⁴ For more information, see the discussion in chapter 2, "Methanol and Energy Products."

apparel imports under CBERA decreased by \$388 million between 2022 and 2024, a 40.0 percent decline from 2022. Political instability in Haiti and the subsequent economic disruptions drove the fall in textile and apparel imports under CBERA since 2021. ⁵⁵ Imports under the CBERA program in the agriculture and other mining and manufacturing sectors remained relatively stable in 2024 compared to their levels in 2023 and 2022.

Methanol and Energy Products

Overview

U.S. imports of methanol and energy products under the CBERA program averaged \$996 million by value between 2020 and 2024. Most of these products qualified for benefits under the CBTPA, but methanol not for fuel use (HTS subheading 2905.11.20) and waste petroleum oils (HTS subheading 2710.99.90) qualified under CBERA as enacted in 1983. These imports had a particularly large increase from 2021 to 2022, driven by increased imports of crude oil from Guyana and Trinidad and Tobago. However, imports declined from \$1.4 billion in 2022 to \$914 million in 2023 and recovered only slightly to \$943 million in 2024 (figure 2.2). To 2024 (figure 2.2).

U.S. imports of methanol under the CBERA program nearly doubled in value from 2020 to 2021 but then declined in each of the following three years. These imports all came from Trinidad and Tobago and were used as a feedstock in the production of a range of industrial chemicals, including formaldehyde and acetic acid. The factors behind the fluctuations in methanol imports are discussed in more detail in the section below.

⁵⁵ For more information, see the discussion in chapter 2, "Textile and Apparel Products."

⁵⁶ Most of these products qualify for benefits under the CBTPA, but methanol other than for use in producing synthetic natural gas or for direct use as a fuel (HTS subheading 2905.11.20) and waste petroleum oils (HTS subheading 2710.99.90) qualify under CBERA as enacted in 1983. USITC DataWeb/Census, HTS subheading 2905.11.20, methanol other than for use in producing synthetic natural gas or for direct use as a fuel, and chapter 27, mineral fuels, accessed February 10, 2025.

⁵⁷ Prices for crude oil and natural gas can have a substantial impact on the value of imported energy products and methanol. However, changes in the annual quantity of barrels of energy products imported under CBERA generally followed the same trends as changes in the value imported. The average annual prices for Brent (a global benchmark for crude oil) and Henry Hub (a U.S. benchmark for natural gas) steadily increased each year from 2020 to 2022; however, these prices dropped from 2022 to 2023 by 18.3 percent and 60.8 percent and then declined less severely from 2023 to 2024 (by 2.4 percent and 13.4 percent, respectively). EIA, "Europe Brent Spot Price FOB," accessed May 1, 2025; EIA, "Henry Hub Natural Gas Spot Price," accessed March 10, 2025.

1,600 1,400 1,200 1,000 Million \$ 800 600 400 200 0 2020 2021 2022 2023 2024 Methanol Energy products

Figure 2.2 U.S. imports for consumption of methanol and energy products under CBERA, by product, 2020-24

In millions of dollars. Underlying data for this figure can be found in appendix table E.3.

Source: USITC DataWeb/Census, accessed February 10, 2025.

Note: In this figure, methanol refers to methanol (other than for use in producing synthetic natural gas or for direct use as a fuel) imported under Harmonized Tariff Schedule of the United States subheading 2905.11.20. Energy products refers to energy products imported under Harmonized Commodity Description and Coding System (HS) chapter 27 (mineral fuels).

Energy Products

U.S. imports of energy products under the CBERA program fluctuated between 2020 and 2024 but generally increased, rising from \$547 million to \$764 million during that period. These products consisted mostly of crude oil imported from Trinidad and Tobago and Guyana, with small amounts of heavy fuel oil. The imports nearly doubled in value to \$1.1 billion in 2022, dropped to \$729 million in 2023, and rose slightly to \$764 million in 2024.⁵⁸ These trends mostly reflected changes in the share of crude oil from these countries imported under the CBERA program, which, in turn, reflect changes in both the value and volume of U.S. imports of crude oil. U.S. imports of crude oil from Trinidad and Tobago under the program steadily increased from 2022 to 2024, even though total U.S. imports of crude oil from that country declined from 2022 to 2023 (from \$1.1 billion to \$918 million) and then rebounded to \$1.1 billion in 2024.⁵⁹ The increased usage of the CBERA program in Trinidad and Tobago was more than offset, however, by a sharp decline in program usage by Guyana. A U.S. industry representative indicated that many crude oil imports from Guyana are first stored in a terminal in The

⁵⁸ Like the import value data, the quantity of barrels of energy products imported under the CBERA program increased sharply (81.9 percent) from 2021 to 2022, dropped in 2023 (-16.9 percent), and then recovered slightly (5.9 percent) in 2024. USITC DataWeb/Census, accessed May 1, 2025.

⁵⁹ USITC DataWeb/Census, HTS subheading 2709.00.10, petroleum oils and oils obtained from bituminous minerals, crude: testing under 25 degrees A.P.I.; HTS subheading 2709.00.20, petroleum oils and oils obtained from bituminous minerals, crude: testing 25 degrees A.P.I. or more, accessed March 13, 2025.

Bahamas before being shipped to the United States and, therefore, are not eligible for CBERA preferences. ⁶⁰ U.S. crude oil imports from Guyana claiming preferences under the CBERA program plummeted after peaking at \$509 million in 2022, reaching zero in 2024 (table 2.4). This occurred at the same time as total U.S. crude oil imports from Guyana—both under CBERA and outside the program—grew annually, increasing from \$2.5 billion to \$4 billion. ⁶¹

⁶⁰ U.S. industry representative, email message to USITC staff, July 8, 2025. Bill of lading data shows an increase in U.S. imports of crude oil listing The Bahamas as the Territory of Origin after 2022, with commodity descriptions indicating that these are grades of crude oil originating from other countries (including Guyana). S&P Global, GTA database, crude oil or 2709, accessed July 9, 2025. Under the CBTPA, crude oil may qualify for duty-free treatment if it meets the rules of origin for the USMCA. 19 U.S.C. § 2703(b)(5)(C)(ii); HTS, General Note 17(b)(ii). The USMCA generally requires that products be "imported into the customs territory of the United States from the territory of a USMCA country" to qualify for duty-free treatment, with limited exceptions for products that undergo repacking/preservation and that remain under the control of customs authorities in a third country. HTS, General Note 11(b) & (h)(iv).

⁶¹ USITC DataWeb/Census, HTS subheading 2709.00.10, petroleum oils and oils obtained from bituminous minerals, crude: testing under 25 degrees A.P.I.; HTS subheading 2709.00.20, petroleum oils and oils obtained from bituminous minerals, crude: testing 25 degrees A.P.I. or more, accessed March 13, 2025.

Table 2.4 U.S. imports for consumption under CBERA of methanol and energy products, by major product, source, and year, 2020-24

In millions of dollars. HTS = Harmonized Tariff Schedule of the United States; A.P.I. = degrees American Petroleum Institute gravity (a measure of relative density); ** = rounds to zero.

Product						
(HTS subheading)	Source	2020	2021	2022	2023	2024
Methanol (2905.11.20)	Trinidad & Tobago	249	472	377	185	179
Total methanol	Total imports, methanol	249	472	377	185	179
Crude petroleum < 25 API						
(2709.00.10)	Trinidad & Tobago	183	222	439	650	736
Crude petroleum < 25 API						
(2709.00.10)	Total imports, 2709.00.10	183	222	439	650	736
Crude petroleum ≥ 25 API						
(2709.00.20)	Guyana	263	185	509	79	0
Crude petroleum ≥ 25 API						
(2709.00.20)	Trinidad & Tobago	101	0	91	0	27
Crude petroleum ≥ 25 API						
(2709.00.20)	Belize	0	0	0	0	0
Crude petroleum ≥ 25 API						
(2709.00.20)	Total imports, 2709.00.20	364	185	600	79	27
Petroleum distillate < 25		_	_			
API (2710.19.06)	Jamaica	0	0	18	0	0
Petroleum distillate < 25			•	4-	•	•
API (2710.19.06)	Curacao	0	0	15	0	0
Petroleum distillate < 25			•	•	•	•
API (2710.19.06)	Trinidad & Tobago	0	0	0	0	0
Petroleum distillate < 25	T . I:		•	22	•	•
API (2710.19.06)	Total imports, 2710.19.06	0 **	0 **	33 **	0	0
All other energy products	Total imports				0	0
Total energy products	Total imports, energy products	547	407	1,072	729	764
Total methanol and	Total imports, methanol and	70.0	070	4 440	04.6	0.42
energy products	energy products	796	879	1,449	914	943

Source: USITC DataWeb/Census, accessed February 10, 2025.

Note: Methanol and energy products refer to methanol (other than for use in producing synthetic natural gas or for direct use as a fuel) imported under HTS subheading 2905.11.20 and energy products imported under Harmonized Commodity Description and Coding System (HS) chapter 27 (mineral fuels). Fuel oil represents distillate and residual fuel oil (including blends) derived from petroleum or oils from bituminous minerals, testing under 25 degrees A.P.I. (2710.19.06). Crude oil represents petroleum oils and oils from bituminous minerals, crude, testing under 25 degrees A.P.I. (2709.00.10) or 25 degrees A.P.I. or more (HTS subheading 2709.00.20).

As noted in the 2023 Commission report, the CBERA utilization rate for energy products often fluctuates but is generally low. 62 One reason importers purchasing energy products from CBERA-eligible countries may not use CBERA preferences is that the normal trade relations (NTR) duty rates for crude oil and fuel oil are already very low, ranging from 5.25 cents per barrel to 10.5 cents per barrel (typically between 0.1 and 0.2 percent in ad valorem equivalent terms). 63 These relatively low duty savings limit the incentive to file for duty-free treatment. Additionally, U.S. crude oil importers can use programs other than CBERA, such as the duty drawback program or U.S. foreign-trade zone program, to save on the duties. 64 Importers using the duty drawback program must pay duties up front but then receive refunds

⁶² USITC, CBERA 2023, September 2023, 51.

⁶³ Ad valorem equivalent refers to the total of duties collected on the imports divided by the customs value of the imports. USITC, HTS (2025) Revision 3, March 2025, V-27-5, V-27-7.

⁶⁴ USITC, CBERA 2023, September 2023, 51; USITC, Foreign Trade Zones (FTZs), April 2023, 196–99, 203, 204.

on certain taxes and fees in addition to the duties, offering greater total savings for qualifying imports than CBERA preferences. ⁶⁵ The low CBERA utilization rate suggests that the CBERA program has not significantly contributed to Guyana's crude oil export growth. By extension, it suggests that economic development supported by this export growth (such as the tourism sector investments discussed below) cannot be attributed to the CBERA program.

Guyana's crude oil production first reached commercial levels in 2019, with the country's entire production continuing to come from a large offshore block operated by a consortium led by U.S.-owned ExxonMobil. 66 As noted in the 2023 Commission report, Guyana received significant foreign investment in oil exploration and production between 2020 and 2021, namely from ExxonMobil. 67 ExxonMobil is continuing to invest in its Guyana operations and expand the country's oil capacity. In November 2024, ExxonMobil Guyana acquired the floating production, storage, and offloading (FPSO) vessel *Prosperity* from SBM Offshore for \$1.26 billion, among other investment projects. The acquisition preserved a capacity of 220,000 barrels per day ahead of the expiration of the vessel's maximum lease term in November 2025. 68 The ExxonMobil-led consortium is expected to expand output capacity by another 250,000 barrels per day in 2025 and has longer-term plans to grow production capacity to 1.3 million barrels per day by year-end 2027. Such growth would position Guyana as the second-largest producer in Central America and South America, after Brazil. 69

Oil discovery in Guyana has also generated a significant amount of travel to the country, triggering new investments in the tourism sector. U.S. entities have invested in multiple luxury hotel projects, including Four Points by Sheraton, Hilton Garden Inn, and Hyatt Place. OU.S. airline companies have also added more flights to Guyana to support the additional traffic.

Methanol

Methanol is a basic commodity chemical that is used primarily as a feedstock to manufacture numerous other chemicals. Major uses of methanol in the United States include the production of formaldehyde and acetic acid, as well as direct use as a fuel.⁷² Formaldehyde resins are used in the production of plywood, particleboard, paints, and adhesives.⁷³ Acetic acid is an input for other intermediate chemicals

⁶⁵ USITC, CBERA 2023, September 2023, 51; USITC, Foreign Trade Zones (FTZs), April 2023, 196–99, 203, 204.

⁶⁶ Guyana's crude oil production comes from the 6.6-million-acre Stabroek Block, located off the shore of Guyana. Since the initial discovery in 2015, the consortium has made more than 30 oil and natural gas discoveries within the block. EIA, "Guyana Becomes Key Contributor," May 21, 2024; King and Parraga, "Oil Output, Exports Drove Guyana Economy's Growth," January 17, 2025; USITC, *CBERA 2023*, September 2023, 101.

⁶⁷ USITC, CBERA 2023, September 2023, 83–84.

⁶⁸ Guyana Business Journal, "ExxonMobil's FPSO Acquisition Strengthens Guyana's Oil Sector Position," November 9, 2024; Offshore Energy, "ExxonMobil Buys FPSO Working Off Guyana," November 8, 2024.

⁶⁹ EIA, "Guyana Becomes Key Contributor," May 21, 2024; ExxonMobil, "ExxonMobil Guyana Announces Arrival of *ONE GUYANA* FPSO," April 16, 2025.

⁷⁰ Juan, "US Companies Invest US\$15B in Guyana over Four Years," December 25, 2024.

⁷¹ USITC, hearing transcript, February 20, 2025, 45-46 (Ambassador Hinds, Embassy of the Republic of Guyana).

⁷² Bescond et al., *Methanol*, October 2024, 26–28.

⁷³ Bescond et al., *Methanol*, October 2024, 15.

that go into plastic bottles, paints, adhesives, and synthetic fibers.⁷⁴ Direct fuel applications include the manufacture of methyl tert-butyl ether, tertiary-amyl methyl ether, dimethyl ether, and biodiesel.⁷⁵

Methanol from Trinidad and Tobago accounts for a large share of total U.S. imports under the CBERA program. In 2024, Trinidad and Tobago supplied 100 percent of the methanol imported by the United States under CBERA. The country also figures prominently in the methanol industry worldwide. Trinidad and Tobago continues to be the primary source of U.S. methanol imports, but imports of methanol have become less important in the U.S. market. The domestic industry has expanded capacity significantly, with the United States becoming a net exporter of methanol in 2022. In 2024, U.S. imports of methanol from Trinidad and Tobago were valued at \$179.9 million, whereas the value of U.S. production of methanol is estimated to have been \$4.8 billion. The following section describes methanol trade and production in relation to the United States and Trinidad and Tobago.

U.S. Methanol Production Capacity

Early in the 21st century, relatively high North American prices for natural gas, the primary methanol feedstock, made domestic production generally unprofitable. The number of operating U.S. methanol plants fell from 17 in the late 1990s to 4 during 2005–12. Subsequent improvements in gas production technologies in North America, such as combining fracking with horizontal drilling, lowered prices. The abundant supply of relatively inexpensive natural gas facilitated the restart, relocation, or construction of methanol production facilities along the U.S. Gulf Coast and near other sources of natural gas. The number of plants operating in the United States reached 13 in 2024. Total U.S. methanol capacity surpassed 10.8 million metric tons (mt) at year-end 2024 and is projected to exceed 12.0 million mt by year-end 2027.

U.S. methanol production continues to climb from its low point of 1.0 million mt in 2012, reaching approximately 9.3 million mt in 2024. 80 Since 2023, two more greenfield plants 1 began producing methanol in the U.S. market: the Alpont plant in Oregon, Ohio, with a capacity of 0.08 million mt, and Geismar 3, Methanex's third plant in Geismar, Louisiana, with a capacity of 1.8 million mt. Additionally, in January 2024, the Fairway Methanol plant in Clear Lake, Texas, increased its capacity by 0.13 million mt using captured carbon dioxide to produce reduced-carbon methanol.

⁷⁴ Bescond et al., *Methanol*, October 2024, 17.

⁷⁵ Bescond et al., *Methanol*, October 2024, 15–17.

⁷⁶ EIA, "Henry Hub Natural Gas Spot Price," accessed March 10, 2025.

⁷⁷ USITC, *CBERA 2023*, September 2023, 53.

⁷⁸ EIA, "New Methanol Plants Expected to Increase," February 21, 2019.

⁷⁹ Bescond et al., *Methanol*, October 2024, 25; Sanzillo, "Company Turns Halt of Gas-to-Methanol," April 9, 2024.

⁸⁰ Bescond et al., *Methanol*, October 2024, Data workbook.

⁸¹ A greenfield plant is a newly built facility as opposed to an existing facility that has been modified or expanded.

⁸² Methanex, "Methanex Reports Higher Fourth Quarter 2023 Earnings," January 31, 2024; "Geismar 3 ('G3') Produces First Methanol," July 30, 2024; Bescond et al., *Methanol*, October 2024, Data workbook.

⁸³ Celanese, "Celanese Begins Carbon Capture and Utilization," January 8, 2024; Tullo, "Celanese Venture Is Making Methanol from Carbon Dioxide," January 17, 2024.

U.S. Demand for Methanol

U.S. demand for methanol continues to grow. With the exception of the COVID-19 pandemic-induced downturn, U.S. demand has risen steadily from its low point of 5.5 million mt in 2009 to an estimated 7.8 million mt in 2024. 44 U.S. consumption is estimated to continue growing by 2.3 percent per year. 45

U.S. Imports of Methanol

The United States imports methanol under two subheadings. When imported for use in producing synthetic natural gas or for direct use as a fuel (HTS subheading 2905.11.10), methanol enters duty free. When imported for other uses (HTS subheading 2905.11.20), methanol is dutiable at the NTR rate of 5.5 percent ad valorem or eligible for duty-free or reduced-duty treatment under a number of preferential programs, including CBERA, and free trade agreements. More than 95 percent of U.S. imports of methanol under HTS subheading 2905.11.20 from Trinidad and Tobago entered under CBERA in 2024. Trinidad and Tobago—the only supplier of methanol to the United States among CBERA beneficiaries during 2023 to 2024—became the primary source of total U.S. methanol imports under HTS subheading 2905.11.20 in 1998. Its share of total U.S. methanol imports expanded to 71.7 percent by value in 2009 before declining progressively to between 50 percent and 60 percent in each year from 2016 to 2022. Trinidad and Tobago's share fell further in the past two years, accounting for 48.7 percent of U.S. methanol imports in 2023 and 48.5 percent in 2024.

As U.S. production increased, the value of total U.S. imports of methanol under HTS subheading 2905.11.20 from Trinidad and Tobago as well as other countries rose in 2021 but fell in every year since. The value of total imports fell to less than \$400 million in each of the past two years.⁸⁷ In 2023, total imports fell 41.1 percent to \$381 million and declined another 2.7 percent in 2024 to \$371 million. The value of methanol imports from Trinidad and Tobago fell at a slightly faster rate than total imports, declining \$192 million (50.9 percent) to \$185 million in 2023, before falling another 3.0 percent to \$179 million in 2024 (table 2.4).⁸⁸

Major Producers in Trinidad and Tobago

Trinidad and Tobago continues to be a significant producer of methanol, although some of the island nation's eight methanol plants have been idled because of moves into other natural gas-based businesses and the depletion of maturing natural gas fields. Trinidad and Tobago is the largest exporter of liquefied natural gas in Latin America and one of the world's largest exporters of methanol and ammonia. Gas production reached a peak of 4.2 billion cubic feet per day in 2010, fell below 3.0 billion cubic feet daily in 2021, and has stayed below that level. Recent gas discoveries and agreements to develop other fields are mitigating further decline, but production has yet to return to earlier levels. Trinidad and Tobago has reached agreements with Venezuela to extract natural gas from fields that

⁸⁴ Sriram et al., *Methanol*, December 8, 2017, 39; Bescond et al., *Methanol*, October 2024, 29.

⁸⁵ Bescond et al., *Methanol*, October 2024, 29. This estimate includes methanol for use in fuel applications.

⁸⁶ USITC DataWeb/Census, HTS 2905.11, accessed March 14, 2025.

⁸⁷ USITC DataWeb/Census, accessed February 10, 2025.

⁸⁸ USITC DataWeb/Census, HTS 2905.11, accessed March 14, 2025.

⁸⁹ Reuters, "Shell Takes Final Investment Decision to Develop Manatee," July 9, 2024.

⁹⁰ Williams, "Natural Gas Crisis," April 23, 2023; Ferrie, "Trinidad's Tax Reforms Receive Mixed Reviews," October 25, 2022.

straddle the two countries' maritime boundary. ⁹¹ Natural gas supplies will likely be limited until the Manatee field, part of the 10-trillion-cubic-foot Loran-Manatee field that extends across the Trinidad-Venezuela marine border, begins production in 2027. ⁹² Additional supplies were also expected to come from the Dragon field (located in Venezuelan territorial waters) in 2028. ⁹³ According to Trinidad and Tobago's Minister of Energy and Energy Industries, Dragon and Manatee could provide the island nation with a combined 1 billion cubic feet of natural gas per day. ⁹⁴ However, the project developing the Dragon field had been using an exception to the U.S. Venezuela-related sanctions program, which the United States revoked in April 2025. ⁹⁵

Three methanol producers currently operate in Trinidad and Tobago: Proman, Methanex, and Caribbean Gas Chemical Ltd. (CGCL). Proman owns five methanol plants in Trinidad and Tobago at the Methanol Holdings Trinidad Limited (MHTL) site, with a combined capacity of 4.0 million mt. ⁹⁶ Some plants were idled briefly in 2020 because of the COVID-19 pandemic-related slowdown and in early 2021 because of a lack of natural gas. In July 2021, Proman secured a new contract with National Gas Company (NGC) of Trinidad and Tobago to supply natural gas to the entire MHTL site. ⁹⁷ Previously, contracts were drawn up on a per-plant basis.

Methanex, with two plants in Trinidad and Tobago, has also been affected by the lack of sufficient natural gas. Methanex idled one of its plants with a capacity of 0.9 million mt in March 2020 as a result of the COVID-19 pandemic-related global slowdown, but it left the plant idled as the gas supply contract for the plant expired. ⁹⁸ In October 2023, Methanex reached agreement with NGC for a two-year gas supply contract for this plant beginning in September 2024. ⁹⁹ When Methanex restarted this plant,

⁹¹ Reuters, "Shell Takes Final Investment Decision to Develop Manatee," July 9, 2024.

⁹² Williams, "Natural Gas Crisis," April 23, 2023.

⁹³ The Dragon gas field is estimated to contain 4.2 trillion cubic feet of natural gas. Trinidad and Tobago plans to ask the government of the United States to extend the license, which is due to expire in October 2025. Julien, "Methanex Remains Mum on Restart," August 8, 2023; MEEI, "Preliminary Work on Dragon Gas," October 11, 2024; Buitrago, Williams, and Parraga, "First Output from Venezuela's Dragon," December 22, 2023; Parraga and Williams, "Exclusive: Trinidad to Seek US Extension," February 25, 2025.

⁹⁴ Young is now Prime Minister of Trinidad and Tobago. Parraga and Williams, "Exclusive: Trinidad to Seek US Extension," February 25, 2025.

⁹⁵ 31 C.F.R. pt. 591, Venezuela Sanctions Regulations. Shell received a specific license in October 2023 providing a two-year exception to the U.S. sanctions for its activities developing the Dragon field. Trinidad and Tobago had announced earlier in 2025 that it would seek an extension to Shell's license. However, in April 2025, the U.S. Department of the Treasury revoked Shell's license as well as a similar two-year license provided to BP to develop the Cocuina field in Venezuela for Trinidad and Tobago. Both projects were provided until May 27, 2025, to safely wind down. The U.S. Department of the Treasury had also allowed some exceptions to its Venezuela Sanctions Regulations program for new investment in oil or gas sector operations in Venezuela under general license 44 but then removed these exceptions when it issued general license 44A in April 2024. Parraga and Williams, "Exclusive: Trinidad to Seek US Extension," February 25, 2025; Cavcic, "US Axes Shell and BP's Licenses," April 9, 2025; Treasury, OFAC, Publication . . . Licenses 31, 5M, 9H, 44, and 45, 88 Fed. Reg. 76991 (Nov. 8, 2023); USDOT, OFAC, Publication Web General Licenses 50, 8M, and 44A, 89 Fed. Reg. 35703 (May 2, 2024).

⁹⁶ Proman, "Methanol Holdings (Trinidad) Limited," accessed March 17, 2025.

⁹⁷ Trinidad and Tobago Newsday, "NGC, Methanol Holdings Sign Gas Supply Contract," August 4, 2021.

⁹⁸ Methanex, "Methanex Reduces Production Levels In Trinidad and Chile," March 16, 2020; "Methanex Provides Update on Trinidad Operations," January 7, 2021.

⁹⁹ Julien, "Methanex to Shut Down Atlas, Restart Titan Plant," October 13, 2023.

however, it idled its other plant, with a capacity of 1.8 million mt, because that plant's 20-year gas supply contract had expired. 100

CGCL owns one methanol plant in Trinidad and Tobago, with a capacity of 1.0 million mt, that began commercial operations in January 2021. ¹⁰¹ CGCL is a joint venture, with Mitsubishi the majority owner and NGC and Massy Holdings the minority stakeholders.

Access to the U.S. market through the CBERA program supported the development of the methanol industry in Trinidad and Tobago. Given Trinidad and Tobago's location near the Panama Canal and established methanol production capacity, the country is ideally positioned to become a major hub for methanol bunkering of ocean-going vessels as the shipping industry works to reduce its GHG emissions. ¹⁰²

Textile and Apparel Products

U.S. imports of textiles and apparel under the CBERA program decreased from \$978 million in 2022 to \$590 million in 2024, a 39.7 percent decline (table 2.5), with Haiti accounting for virtually all such imports. Declining U.S. imports from Haiti are attributed to the continued political instability and security concerns, which have created significant barriers to production in the country. Even so, the uncertainty over the renewal of trade preferences for Haiti has also been cited as a reason that buyers withdrew orders from the country. Description of the country.

¹⁰⁰ Methanex, "Methanex Reports Third Quarter 2024 Results," November 6, 2024.

¹⁰¹ CGCL, "Company Profile," accessed February 28, 2025; Bridglal, "CGCL's Di-Methyl Ether Plant Starts Commercial Operations," January 13, 2021; "Caribbean Gas Chemical Limited," accessed March 1, 2023; Market Report Company, "Caribbean Gas Chemical JV Starts Up," January 20, 2021.

¹⁰² Bunkering refers to refueling a ship. Northam, "Shipping Industry Is Pressured to Cut Pollution," December 1, 2021; Hamilton-Davis, "Trinidad and Tobago to Do Feasibility Study," September 21, 2024.

¹⁰³ Textile and apparel products are classified under chapters 50–63 and 65. The majority of these products qualify for benefits under the CBTPA, HOPE, and HELP, although a small number of lines qualify under CBERA as enacted in 1983. In 2024, imports for consumption under CBERA as enacted in 1983 totaled \$108,000. USITC DataWeb/Census, HTS chapters 51–63, 65 accessed July 28, 2025.

¹⁰⁴ ILO, *Better Work Haiti*, September 12, 2024, 11–12; USITC, hearing transcript, February 20, 2025, 88–89 (testimony of Wilhelm Lemke, ADIH); Cotrino, "'Living a Nightmare': Haiti," August 14, 2023, 16.

¹⁰⁵ USITC, hearing transcript, February 20, 2025, 50 (testimony of Beth Hughes, AAFA); USITC, hearing transcript, February 20, 2025, 56 (testimony of Wilhelm Lemke, ADIH); USITC, hearing transcript, February 20, 2025, 59 (testimony of Gail Strickler, Brookfield Associates); USITC, hearing transcript, February 20, 2025, 72 (testimony of Marc Doyon, Gildan Activewear).

Table 2.5 U.S. imports for consumption under CBERA of textiles and apparel, by source and year, 2020–24

In millions of dollars. ** indicates less than \$500,000.

Country	2020	2021	2022	2023	2024
Haiti	750	1010	978	751	590
Jamaica	**	**	**	**	0
All other import sources	**	**	0	**	**
Total imports	750	1010	978	752	590

Source: USITC DataWeb/Census, accessed February 10, 2025.

Note: Textile and apparel products are imported under Harmonized Commodity Description and Coding System (HS) chapters 50-63, 65.

After the sharp COVID-19 pandemic-related decline in U.S. imports in 2020, Haiti's apparel sector experienced a modest recovery, with U.S. imports increasing from \$750 million in 2020 to \$1,010 million in 2021. ¹⁰⁶ The assassination of President Jovenel Moïse in July 2021 and ensuing gang violence resulted in the decline of U.S. imports from Haiti from 2021 to 2022. ¹⁰⁷ In 2022 and 2023, factory closures mounted as firms scaled back or entirely withdrew operations in the country, citing persistent security and operating issues. ¹⁰⁸ Gang occupation in Port-au-Prince caused factories to suspend operations for periods of time in 2024, further stunting production. ¹⁰⁹ Meanwhile, the impending expiration of Haitispecific benefits exacerbated buyers' concerns and contributed to the decrease in production in the country. ¹¹⁰ Consequently, textile and apparel manufacturing jobs in Haiti have dropped significantly, from over 60,000 in 2021 to nearly 22,000 in 2024. ¹¹¹

Haiti is afforded trade preferences under the CBTPA, which expires September 30, 2030 (<u>table 1.1</u>), and the Haiti HOPE/HELP program, expiring September 30, 2025. The CBTPA requires U.S. apparel imports to be made from U.S. yarns and fabrics, with the exception of certain knit apparel made from regional fabrics using U.S. yarns, which qualifies for preferences subject to quantitative limits. Haiti-specific preferences under the Haiti HOPE and HELP Acts allow for more flexibility in the sourcing of inputs. The HOPE I and HOPE II Acts established, and later extended, tariff preference levels (TPLs) for apparel products, allowing duty-free treatment for certain quantities of apparel made in Haiti using fabrics from

¹⁰⁶ USITC, *U.S.-Haiti Trade*, December 2022, 62, 82.

¹⁰⁷ USITC, Hearing transcript, February 20, 2025, 53 (testimony of Gail Strickler, Brookfield Associates); USITC, Hearing transcript, February 20, 2025, 65 (testimony of Marc Doyon, Gildan Activewear); USITC, Hearing transcript, February 20, 2025, 56 (testimony of Wilhelm Lemke, ADIH).

¹⁰⁸ USTR, USTR Annual Report on the Implementation of the Technical Assistance Improvement and Compliance Needs Assessment and Remediation, June 18, 2024, 3; Associated Press, "Major Textile Factory in Haiti to Close Plant, Lay Off 3,500," February 2, 2023.

¹⁰⁹ ILO, Better Work Haiti, September 12, 2024, 9–11.

¹¹⁰ The security concerns in the capital have reportedly contributed to the consolidation of factories in the Northeast. Furthermore, representatives reported increasing costs associated with ensuring the security of workers and goods. ILO, *Better Work Haiti*, September 12, 2024, 11–12; USITC, hearing transcript, February 20, 2025, 88–89 (testimony of Wilhelm Lemke, ADIH).

¹¹¹ USITC, Hearing transcript, February 20, 2025, 61 (testimony of Gail Strickler, Brookfield Associates).

¹¹² CRS, *Caribbean Trade Preference Programs*, February 22, 2023, 3–4; USITC, *U.S.-Haiti Trade*, December 2022, 35; USDOC, "Trade Preferences for Haitian Textiles and Apparel," June 16, 2017.

¹¹³ CBTPA, Articles Eligible for Preferential Treatment, 19 § 10.223 (2024); CRS, *The Haitian Economy and the HOPE Act*, June 24, 2010, 15; CRS, *Caribbean Trade Preference Programs*, February 22, 2023, 2.

any country, subject to specific value-added requirements. ¹¹⁴ The HELP Act further increased knit and woven apparel TPLs and expanded preferences to additional products. ¹¹⁵ The flexibility afforded by HOPE/HELP contributes to a larger share of U.S. imports under the CBERA program as compared to the CBTPA (table 2.6).

Table 2.6 Duty-free U.S. general imports of textiles and apparel from CBERA countries, 2020–24 In millions of dollars. CBTPA = Caribbean Basin Trade Partnership Act; HOPE = Haitian Hemispheric Opportunity through Partnership Encouragement; HELP = Haiti Economic Lift Program.

Program	2020	2021	2022	2023	2024
Total imports under the CBTPA	175	254	230	145	175
Total imports under HOPE/HELP	573	739	739	558	386
Total general imports	748	993	969	703	561

Source: Compiled from official statistics of the USDOC, ITA, OTEXA, accessed February 15, 2025.

Note: Because of rounding, figures may not add to totals shown. Data in this table may not equal data presented in figure 2.1 because the Office of Textiles and Apparel (OTEXA) data are for general imports rather than imports for consumption. General imports include all merchandise from foreign countries, including that which enters U.S. customs territory immediately or is entered into bonded warehouses or foreign trade zones under U.S. Customs and Border Protection custody. By comparison, imports for consumption measures the total merchandise that has physically cleared through U.S. customs immediately or after withdrawal for consumption.

The CBERA program supports U.S. producers in two ways: through direct U.S. exports of yarn and fabrics to Haiti and by supporting a regional supply chain where U.S. yarn is used in downstream fabric production in the Dominican Republic-Central America FTA (CAFTA-DR) countries, which is then used in apparel production in Haiti. Haiti's preferences further allow for integrated textile and apparel trade with the Dominican Republic, with many inputs imported and finished goods exported through the country. Coproduction is facilitated by market access opportunities along the supply chain. For example, the Dominican Republic imports inputs regionally and from U.S. producers through CAFTA-DR

¹¹⁴ HOPE I established TPLs, which permitted a specified quantity of products to enter the United States duty free regardless of the origin of inputs, with increasing shares of value-added inputs or assembly sourced from Haiti, the United States, or other preference program beneficiaries. HOPE II expanded TPL coverage to include additional knit items, established the earned import allowance program, and allowed preference eligibility for articles shipped from Haiti or the Dominican Republic. USITC, *U.S.-Haiti Trade*, December 2022, 35; CRS, *Caribbean Trade Preference Programs*, February 22, 2023, 5–6; CRS, *The Haitian Economy and the HOPE Act*, June 24, 2010, 16–17; USDOC, "Trade Preferences for Haitian Textiles and Apparel," June 16, 2017.

¹¹⁵ The HELP Act increased the quantitative limitations on knit and woven products from 70 million to 200 million square meter equivalents (SMEs), extended unlimited duty-free imports to additional products, modified the value-added TPLs to gradually increase from 50 percent to 60 percent, updated the EIA program from the 1 SME allowance for every 3 SMEs of qualifying fabric to a 1 SME allowance for every 2 SMEs of qualifying fabric intended for apparel manufacture in Haiti. USITC, *U.S.-Haiti Trade*, December 2022, 35; CRS, *Caribbean Trade Preference Programs*, February 22, 2023, 6–7; CRS, *The Haitian Economy and the HOPE Act*, June 24, 2010, 20–21; USDOC, "Trade Preferences for Haitian Textiles and Apparel," June 16, 2017.

¹¹⁶ USITC, hearing transcript, February 20, 2025, 68 (testimony of Marc Doyon, Gildan Activewear); USITC, hearing transcript, February 20, 2025, 69, 71 (testimony of Gail Strickler, Brookfield Associates); USITC, hearing transcript, February 20, 2025, 90 (testimony of Beth Hughes, AAFA).

¹¹⁷ The Dominican Republic was the largest supplier of yarns and fabrics to Haiti throughout the time period, accounting for an increasing share of Haiti's imports of yarns and fabrics, up from 29.0 percent in 2018 to 56.7 percent in 2023. USITC, hearing transcript, February 20, 2025, 71, 76 (testimony of Gail Strickler, Brookfield Associates); USITC, *U.S.-Haiti Trade*, December 2022, 119.

and exports textile inputs through free trade zones to Haitian apparel producers. ¹¹⁸ Lower labor and operating costs in Haiti, along with the increased flexibility afforded through HOPE/HELP, provide cost advantages to downstream apparel manufacturing in the country. The Dominican Republic's superior shipping infrastructure makes it more efficient for U.S. companies to import goods from the Dominican Republic. ¹¹⁹

Coproduction between the countries has been impacted by political instability, conflict, and security concerns at the border. Many shipments from Haiti are transported via roads to the Dominican Republic and face gang interference en route, and the Dominican Republic closed its Haitian border multiple times during 2022–24 as a result of political disputes and exacerbated security concerns. Because the Haiti HOPE/HELP program allows apparel produced in Haiti to be exported duty free through the Dominican Republic, potential nonrenewal of the program threatens the coproduction model between the countries. 121

Table 2.6 shows U.S. general imports of textiles and apparel from Haiti receiving preferential duty treatment, broken out by CBTPA or HOPE/HELP provision. U.S. textile and apparel imports under both the CBTPA and HOPE/HELP declined during 2022–24. Imports under the CBTPA decreased 24.1 percent, and imports under HOPE/HELP decreased 47.7 percent. HOPE/HELP still accounted for the majority (68.9 percent) of total duty-free imports in 2024. Table 2.7 shows that total dutiable textile and apparel products accounted for 4.1 percent of total general imports in 2024, compared to 1.3 percent in 2022. In 2023, they made up 8.7 percent of general imports.

Table 2.7 shows specific apparel products that entered the United States under the CBTPA and HOPE/HELP. Knit apparel made from regional or U.S. fabric using U.S. yarns made up the largest share of CBTPA imports. CBERA imports under this category declined from \$128 million in 2022 to \$84 million in 2023, before increasing slightly to \$86 million in 2024. Similarly, CBTPA imports of knit T-shirts made from regional fabrics using U.S. yarns decreased from \$86 million in 2022 to \$51 million in 2023, before increasing to \$84 million in 2024. CBTPA imports of apparel cut and assembled from U.S. fabric decreased 72.4 percent, from \$16 million in 2022 to \$4 million in 2024. U.S. duty-free imports under HOPE/HELP declined in all apparel and made-up textile categories, with the largest decrease in the value-added products with a regional limit category (70.7 percent decrease since 2022). Headgear and

¹¹⁸ HOPE II allows apparel produced in Haiti to be exported duty-free to the United States either directly from Haiti or through the Dominican Republic. USITC, *U.S.-Haiti Trade*, December 2022, 119; Binns and Harrell, "More of Next Level Apparel's Garments Will Come from Haiti and DR," March 24, 2023; USDOC, "Trade Preferences for Haitian Textiles and Apparel," June 16, 2017.

¹¹⁹ One partnership between a Dominican Republic fabric producer and a Haitian apparel manufacturing base reportedly led to a reduction in lead times as well as a 30 percent reduction in duty costs. USITC, *U.S.-Haiti Trade*, December 2022, 119; *Sourcing Journal*, "Hansae Haiti Localizes Synthetic Fabric Sourcing for Speed and Savings," May 15, 2023.

¹²⁰ Disputes over the construction of a canal from the Massacre River resulted in a border closure in September 2023. A partial border closure occurred in March 2024 after a prison break in Port-au-Prince that resulted in increased security concerns. Reuters, "Dominican Republic Intensifies Haiti Border Shutdown Over Canal Row," October 9, 2023; *Dominican Today*, "Haiti-Dominican Border Closure Reaches 55 Days Amid Economic Strain," December 7, 2023; "Dominican Authorities Partially Restrict Border Crossings from Haiti," March 5, 2024; USITC, hearing transcript, February 20, 2025, 59–60 (testimony of Gail Strickler, Brookfield Associates).

Dominican Today, "Dominican Businessmen Urge Action to Renew Hope/Help Trade Programs," December 9, 2024; USDOC, "Haiti–Caribbean Basin Initiative (CBI) and Other Preferential Arrangements," May 27, 2024.

"all other" apparel were the only categories with increases during the period. The former saw a 39.5 percent increase, from \$12 million in 2022 to \$17 million in 2024.

Table 2.7 Textiles and apparel: U.S. general imports from Haiti, by CBTPA and HOPE/HELP duty treatment, 2020–24

In millions of dollars and percentages. HTS = Harmonized Tariff Schedule of the United States; CBTPA = Caribbean Basin Trade Partnership Act; HOPE = Haitian Hemispheric Opportunity through Partnership Encouragement; HELP = Haiti Economic Lift Program.

						Percentage
Product/duty treatment (HTS	2020	2021	2022	2023	2024	change
subheading)	(million \$)	2022–24				
Certain knit apparel of regional or U.S.						
fabrics of U.S. yarns (9820.11.09),						
CBTPA	94	148	128	84	86	-32.6
Certain knit T-shirts of regional fabrics						
of U.S. yarns (9820.11.12), CBTPA	58	83	86	51	84	-2.4
Apparel cut and assembled from U.S.						
fabric (9820.11.06 and 9820.11.18),						
CBTPA	22	23	16	11	4	-72.4
Subtotal, CBTPA	175	254	230	145	175	-24.1
Knit apparel regional limit						
(9820.61.35), HOPE/HELP	243	334	359	267	157	-56.3
Apparel value-added regional limits						
(9820.61.25 and 9820.61.30),						
HOPE/HELP	113	142	97	55	29	-70.7
Woven apparel regional limit						
(9820.62.05), HOPE/HELP	108	151	132	128	104	-21.3
Earned Import Allowance Program						
(9820.62.25), HOPE/HELP	82	79	119	79	68	-42.8
Certain made-up textile articles						
(9820.63.05), HOPE/HELP	17	16	16	11	8	-53.9
Headgear (9820.65.05), HOPE/HELP	9	16	12	14	17	39.5
All other, HOPE/HELP	2	1	3	5	4	31.1
Subtotal, HOPE/HELP	573	739	739	558	386	-47.7
Total duty-free imports	748	993	969	703	561	-42.1
Total dutiable imports	17	31	13	67	24	87.6
Total imports	764	1,023	982	771	585	-40.4

Source: Compiled from official statistics of the USDOC, ITA, OTEXA, accessed February 14, 2025.

Note: Data in this table may not equal data presented in <u>figure 2.1</u> because the Office of Textiles and Apparel data are for general imports rather than imports for consumption. General imports include all merchandise from foreign countries, including that which enters U.S. customs territory immediately or is entered into bonded warehouses or foreign trade zones under U.S. Customs and Border Protection custody. By comparison, imports for consumption measures the total merchandise that has physically cleared through U.S. customs immediately or after withdrawal for consumption.

Haiti's apparel production primarily consists of basic apparel items such as T-shirts and cotton goods. 122 Cotton knit T-shirts and manmade fiber knit T-shirts were the top products imported to the United States during 2022–24 (table 2.8). U.S. CBERA imports under the top four product categories combined decreased by 41 percent, from \$646 million to \$381 million, during 2022–24. Instability within the country and uncertainty over the continuation of the Haiti HOPE/HELP program are reportedly factors contributing to the lack of product complexity; that is, security concerns and the brief period remaining

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¹²² USITC, hearing transcript, February 20, 2025, 84 (testimony of Beth Hughes, AAFA).

before the preference program was set to expire in September 2025 have limited investment in highervalue production activities. 123

Table 2.8 U.S. textile and apparel imports for consumption under the CBERA program, by major product, source and year, 2020-24

In millions of dollars. n.e.s.o.i. = not elsewhere specified or indicated; HTS = Harmonized Tariff Schedule of the United States; **= rounds to zero.

Product (HTS subheading)	Source	2020	2021	2022	2023	2024
Knit cotton T-shirts, singlets, tank tops, and						
similar garments (6109.10.00)	Haiti	203	259	285	226	194
Knit manmade fiber T-shirts, singlets, tank tops,						
and similar garments (6109.90.10)	Haiti	97	130	163	111	80
Knit manmade fiber sweaters, pullovers, and						
similar articles, n.e.s.o.i. (6110.30.30)	Haiti	110	141	112	87	53
Knit cotton sweaters, pullovers, and similar						
articles, n.e.s.o.i. (6110.20.20)	Haiti	62	105	85	46	53
Top 4 products	Haiti	473	636	646	471	381
Total imports	All other sources	**	**	**	**	**
Top 4 products	All sources ^a	473	636	646	471	381
All other textile and apparel products	All sources	267	357	319	266	191
Total imports	Total	740	993	965	737	572

Source: USITC DataWeb/Census, accessed February 10, 2025. Data reflect all official Census revisions for 2018–22, as of that date. Note: Textile and apparel products are imported under Harmonized Commodity Description and Coding System (HS) chapters 50-63, 65. a. Haiti accounted for nearly all textile and apparel imports under CBERA. Less than 0.01 percent of textile and apparel imports originated from other CBERA countries in each year. Jamaica was the largest from 2020 to 2023, and Belize was the largest in 2024.

Other Mining and Manufactured Products

U.S. imports of manufactured products under the CBERA program peaked at \$161 million in 2022, before declining to \$76 million in 2024 (table 2.9). 124 U.S. imports of the top two products by value, expandable polystyrene (EPS) and melamine, peaked in 2022 at \$79 million and \$59 million, respectively, accounting for 85.7 percent of the total value of products in this section imported under the CBERA program. The peaks in the U.S. import values for the two products in 2022 coincided with

¹²³ Higher-value items such as suits were reportedly produced in the country when conditions were better, though investments in activities such as spinning and digital cutting and printing are limited due to the long time horizons required to see a return on investment. USITC, hearing transcript, February 20, 2025, 69 (testimony of Gail Strickler, Brookfield Associates).

¹²⁴ This section covers products not included under the following categories addressed in this report: agriculture (Harmonized Commodity Description and Coding System (HS) chapters 1-24), textiles and apparel (HS chapters 50-63 and 65), and methanol and energy products (HTS subheading 2905.11.20 and HS chapter 27, mineral fuels). This section also includes mining products such as precious metal (other than silver) ores and concentrates and mining ash and residues, containing mainly zinc. These products, however, represent a small share of total U.S. imports under CBERA addressed in this section. The four products discussed in this section qualify for benefits under CBERA as enacted in 1983. USITC DataWeb/Census, HTS subheadings 2933.61.00, 3903,11.00, 3909.10.00, and 3917.23.00, accessed July 28, 2025.

peaks in their pricing in that year. ¹²⁵ During 2023–24, however, the value of U.S. imports of EPS and melamine declined to 2020 levels or lower and their share of the total U.S. imports of products in this section under the CBERA program also declined to 75.3 percent.

Table 2.9 Other manufactured product imports for consumption under the CBERA program, by major product and source and year, 2020–24

In millions of dollars. HTS = Harmonized Tariff Schedule of the United States; HS = Harmonized Commodity Description and Coding System.

Product (HTS subheading)	Source	2020	2021	2022	2023	2024
Polystyrene, expandable, in primary forms						
(3903.11.00)	The Bahamas	55	70	79	57	54
Polystyrene, expandable, in primary forms						
(3903.11.00)	Total	55	70	79	57	54
Melamine (2933.61.00)	Trinidad and Tobago	8	20	59	5	4
Melamine (2933.61.00)	Total	8	20	59	5	4
Rigid tubes, pipes, and hoses (3917.23.00)	Trinidad and Tobago	1	2	3	3	4
Rigid tubes, pipes, and hoses (3917.23.00)	Total	1	2	3	3	4
Urea resins and thiourea resins (3909.10.00)	Trinidad and Tobago	1	3	3	2	3
Urea resins and thiourea resins (3909.10.00)	Total	1	3	3	2	3
Subtotal top 4 products	All sources	65	95	144	68	65
All other manufactured products	All sources	14	16	18	16	11
Total for all products	Total	79	110	161	84	76

Source: USITC DataWeb/Census, accessed February 10, 2025.

Note: This section covers products not included under the following categories addressed in this report: agriculture (HS chapters 01–24), textiles and apparel (HS chapters 50–63, 65), and energy (HS chapter 27 and HTS subheading 2905.11.20). This section also includes mining products such as precious metal (other than silver) ores and concentrates and mining ash and residues, containing mainly zinc. These products, however, represent a small share of total U.S. imports under CBERA addressed in this section.

Table 2.9 shows that the top manufactured product imported under the CBERA program by value during 2020–24 was EPS, which is primarily used in construction, packaging, safety equipment, and automotive applications. After peaking at \$79 million in 2022, U.S. imports under CBERA of EPS in primary forms declined to about \$54 million in 2024 (slightly below the 2020 level). The peak in 2022 was likely driven by demand from the construction and packaging sectors, in combination with growth in e-commerce and packaged foods, following the COVID-19 pandemic. All U.S. EPS imports that entered under CBERA came from The Bahamas. U.S. imports of EPS have generally been declining since a peak of \$155 million in 2014, largely because of U.S. environmental initiatives banning EPS packaging. Although the

¹²⁵ YCharts, "US Producer Price Index: Polystyrene Foam Product Manufacturing (I:USPPIPFP)," accessed August 18, 2025; Procurement Resources, "Melamine Resin Price Trend and Forecast," accessed August 18, 2025. The EPS price increases in 2022 were also attributed to rising prices for its benzene inputs, reportedly an outcome of gasoline price increases resulting from the war in Ukraine. Esposito, "Resin Buyers, Makers Take a Wild Ride in 2022," December 13, 2022.

¹²⁶ Omnexus, "Popular Applications," accessed March 12, 2025.

¹²⁷ Grand View Research, "Expanded Polystyrene Market," accessed March 12, 2025.; USITC, CBERA 2023, September 2023, 60–61; USITC, CBERA 2021, September 2021, 104.

¹²⁸ USITC, CBERA 2021, September 2021, 104; Grand View Research, "Expanded Polystyrene Market," accessed March 12, 2025.

U.S. EPS market was expected to grow between 2023 and 2030, this growth may be offset by actions to phase out EPS. 129

Melamine imports under CBERA grew during 2020–22 from \$8 million to \$59 million but then declined to \$4 million by 2024, a five-year low. All U.S. imports of melamine under CBERA came from Trinidad and Tobago. Melamine is used primarily to manufacture melamine-formaldehyde resins that are feedstocks in chemicals used in the automotive, construction, and furniture sectors, including surface coatings, laminates, molding compounds, paper and textile treatments, and adhesives. Township in U.S. imports of melamine from Trinidad and Tobago in 2021–22 was attributed in part to growing demand from the construction sector after the COVID-19 pandemic. In August 2023, however, a fire at Methanol Holdings (Trinidad) Limited's plant in Trinidad and Tobago temporarily shut down production for six months, contributing to reduced U.S. imports in 2023; shipments resumed again in February 2024.

U.S. imports of (1) rigid tubes, pipes, and hoses of polymers of vinyl chloride and (2) urea resins and thiourea resins grew from \$1 million in 2020 to \$4 million and \$3 million, respectively, in 2024. All CBERA imports of these products came from Trinidad and Tobago.

Agricultural Products

In 2024, U.S. agricultural imports for consumption under CBERA reached \$228 million, an increase of 6.6 percent since 2022 (table 2.10). ¹³⁴ Imports increased in 2023 (5.3 percent) and in 2024 (1.3 percent). The top four product categories imported in 2024—fresh or chilled yams, certain food preparations not elsewhere specified or included, certain raw cane sugar imported under the WTO tariff-rate quota, ¹³⁵ and certain sauces and preparations—accounted for approximately 60 percent of agricultural products imported under CBERA. Despite recent growth, agricultural products as a share of total U.S. merchandise imports under CBERA averaged less than 17 percent between 1989 and 2024. ¹³⁶ The

¹²⁹ Grand View Research, "Expanded Polystyrene Market," accessed March 12, 2025. Some of the bans on certain EPS food packaging applications included phaseout periods that may have delayed the effect of the bans on U.S. imports under CBERA. USITC, CBERA 2023, September 2023, 61.

¹³⁰ On January 7, 2025, the USITC found that a U.S. industry is threatened with material injury by reason of U.S. imports of melamine from Trinidad and Tobago that the U.S. Department of Commerce determined are sold in the United States at less than fair value and subsidized by the government of Trinidad and Tobago. USITC, "USITC Melamine News Release," January 7, 2025; USITC, *Melamine*, January 2025. The USDOC issued a *Federal Register* notice stating that antidumping duty orders on U.S. imports of melamine from Trinidad and Tobago went into effect on January 31, 2025. USDOC, ITA, Melamine From Germany, Japan, the Netherlands, and Trinidad and Tobago: Antidumping Duty Orders, 90 Fed. Reg. 8701 (January 31, 2025).

¹³¹ USITC, *Melamine*, January 2025, 1–10.

¹³² FGE NexantECA (blog), "Global Melamine," September 1, 2021.

¹³³ USITC, *Melamine*, January 2025, 31, 72.

¹³⁴ Agricultural products are classified under HTS chapters 01–24 and qualify for benefits under CBERA as enacted in 1983. USITC DataWeb/Census, chapters 01–24, accessed July 28, 2025.

¹³⁵ The United States and other sugar-importing countries have a sugar quota governed by the Uruguay Round Agreement on Agriculture. The U.S. Department of Agriculture establishes the in-quantity quota each fiscal year, and the Office of the U.S. Trade Representative determines the country allocations. USTR, "Sugar," accessed April 8, 2025.

¹³⁶ For further information on these shares by major sector, consult appendix E, <u>table E.4</u>. USITC, *CBERA 2023*, September 2023, 165.

agriculture sectors of CBERA beneficiaries face several challenges, including small resource bases, land availability, and high costs of production.¹³⁷ Despite being a small portion of CBERA beneficiaries' exports, agricultural products are an important source of rural employment and development.¹³⁸ Access to the U.S. market has been especially important to CBERA beneficiary countries' food exports to their diaspora communities.¹³⁹

Table 2.10 U.S. imports for consumption under CBERA of agriculture products, by major product, source, and year, 2020–24

In millions of dollars. HTS = Harmonized Tariff Schedule of the United States; ** = rounds to zero; n.e.s.o.i. = not elsewhere specified or indicated.

Product (HTS subheading)	Source	2020	2021	2022	2023	2024
Cane sugar (1701.14.10)	Guyana	**	**	20.3	19.0	14.8
Cane sugar (1701.14.10)	Belize	8.5	8.1	9.3	11.3	13.8
Cane sugar (1701.14.10)	Jamaica	6.4	4.1	3.3	4.2	3.7
Cane sugar (1701.14.10)	Barbados	6.4	**	**	0.2	**
Cane sugar (1701.14.10)	Total, 1701.14.10	21.3	12.2	32.9	34.7	32.3
Yams (0714.30.10)	Jamaica	30.1	30.5	30.5	41.9	42.7
Yams (0714.30.10)	Total, 0714.30.10	30.1	30.5	30.5	41.9	42.7
Other food (2106.90.98 [2020–21],						
2106.90.99 [2022–24])	Trinidad and Tobago	21.0	16.7	22.3	24.7	27.0
Other food (2106.90.98 [2020–21],						
2106.90.99 [2022–24])	Jamaica	5.8	8.5	7.7	10.5	9.3
Other food (2106.90.98 [2020–21],						
2106.90.99 [2022–24])	All other import sources	0.1	0.2	0.1	0.2	0.1
Other food (2106.90.98 [2020–21],	Total, 2106.90.98 and					
2106.90.99 [2022–24])	2106.90.99	26.9	25.3	30.1	35.4	36.5
Sauces (2103.90.90)	Jamaica	16.0	21.2	17.5	21.3	19.3
Sauces (2103.90.90)	Trinidad and Tobago	1.8	1.8	1.4	1.8	2.2
Sauces (2103.90.90)	Belize	0.6	1.5	1.7	2.1	2.0
Sauces (2103.90.90)	All other import sources	1.0	0.9	1.1	1.2	1.0
Sauces (2103.90.90)	Total, 2103.90.90	19.4	25.5	21.8	26.4	24.4
Top 4 agricultural products	Total imports	97.7	93.5	115.2	138.5	135.9
All other agriculture products	Total imports	86.8	98.8	98.6	86.7	92.2
Total imports	Total imports	184.5	192.3	213.8	225.2	228.1

Source: USITC DataWeb/Census, accessed February 9, 2023.

Note: Agriculture products are imported under *Harmonized Commodity Description and Coding System* (HS) chapters 1–24. Cane sugar represents other cane sugar, raw, in solid form, without added flavoring or coloring, subject to additional U.S. note 5. Yams represents fresh or chilled yams (Dioscorea spp.), whether or not sliced or in the form of pellets. Other food represents food preparations n.e.s.o.i., including preparations for the manufacture of beverages, non-dairy coffee whiteners, herbal teas, and flavored honey. Sauces represents sauces and preparations; therefore, n.e.s.o.i.

¹³⁷ de la Cruz, "Export Diversification and the Caribbean Basin Economic Recovery Act," September 2008, 9; Taylor and Francis, "Agricultural Export Diversification in Latin America and the Caribbean," 2003, 77, 85.

¹³⁸ Peguero, Zapata, and Sandoval, "Agricultural Production of Central America and the Caribbean: Challenges and Opportunities," 2019, 1, 4, 7.

¹³⁹ Government of Trinidad and Tobago, written submission to the USITC, March 13, 2025, 11.

Fresh or chilled yams constituted 19 percent of agricultural imports under CBERA in 2023 and 2024. 140 Jamaica is the sole CBERA supplier and the largest source of fresh yams (in terms of value) for the United States across all import sources (table 2.10). After an annual increase of 37.4 percent in 2023, the growth rate of U.S. yam imports under CBERA slowed to 1.9 percent in 2024. 141 Severe weather and hurricanes damaged crops and slowed the growth of yam exports. 142 Reports indicate that Jamaica's 28,000 yam farmers experienced rising production costs related to fertilizer and other inputs, resulting in an 8 percent growth in import prices versus 2021–22. 143 According to the Jamaican government, Jamaica is seeking to increase yam exports to \$120 million by 2028, given strong foreign demand for vams amid rising prices. 144

U.S. imports under CBERA of other food preparations increased by 21.3 percent, from \$30.1 million in 2022 to \$36.5 million in 2024 (table 2.10). Imports increased by 17.8 percent in 2023 and 2.9 percent in 2024, driven by both an increase in import volume and average price. 145 This product category accounted for about 16 percent of total CBERA agricultural product imports in 2023 and 2024. Trinidad and Tobago and Jamaica are the two main suppliers of food preparations utilizing CBERA. During 2022-24, Trinidad and Tobago represented about 73 percent of CBERA imports of food preparations—most of which were sugar-containing beverages—and Jamaica represented about 27 percent. 146

¹⁴⁰ Yams are not to be confused with sweet potatoes. Though the word "yam" is often used interchangeably with "sweet potato" in the United States, yams and sweet potatoes are in fact completely different products. Sweet potatoes typically have smooth skin, orange flesh, and are moist and sweet; yams have rough skin, white flesh, and are starchy. The United States does not produce yams, which grow in tropical climates as found in Africa, the Caribbean, and Latin America. Freidline, "A Yam by Any Other Name," November 15, 2022.

¹⁴¹ USITC DataWeb/Census, HTS subheading 0714.30.10, yams, fresh or chilled, accessed March 11, 2025.

¹⁴² Hurricane Beryl, a category 4 hurricane, struck Jamaica in July 2024. Hurricane Rafael also passed by Jamaica as a tropical storm in November 2024. WiredJA, "JAMAICA'S Yam Production," April 1, 2024; Clayton, "Tough to Digest," December 29, 2024; "Yam Farmers Want More for Their Produce," July 21, 2024.

¹⁴³ Other rising input costs include yam sticks, which are made by felling young trees to construct trellises. This traditional method of trellising yams has led to deforestation and limited the supply of suitable trees to keep pace with expanding yam production. Farmers cited this input cost as a hindrance to production. WiredJA, "JAMAICA'S Yam Production," April 1, 2024; Clayton, "Canadian Yam Exporters Rattled by Increasing Price," July 30, 2024. ¹⁴⁴ JAMPRO, "Yam Project Aims to Triple Export Earnings," July 28, 2023; MOAFM, "Minister of Agriculture and Fisheries Says There Is Vast Potential for Investment in the Cultivation of Yams," February 13, 2023; Morris, "Agriculture Minister Urges Farmers to Increase Yam Production for Export," accessed March 11, 2025.

¹⁴⁵ USITC DataWeb/Census, HTS subheading 2106.90.99, other food preparations not elsewhere specified or included, including preparations for the manufacture of beverages, non-dairy coffee whiteners, herbal teas and flavored honey, accessed March 11, 2025.

¹⁴⁶ The 10-digit statistical reporting numbers show different products being supplied by Trinidad and Tobago and Jamaica. Trinidad and Tobago primarily supplied products classified under HTS statistical reporting number 2106.90.9972, which covers preparations for the manufacture of beverages containing sugar derived from sugarcane or sugar beets. Jamaica supplied products classified under HTS statistical reporting numbers 2106.90.9898 and 2106.90.9998, which cover preparations not elsewhere specified or included, other. USITC DataWeb/Census, HTS statistical reporting number 2106.90.9972, preparations for the manufacture of beverages containing sugar derived from sugarcane or sugar beets; HTS statistical reporting numbers 2106.90.9898 and 2106.90.9998, preparations not elsewhere specified or included, other, accessed March 10, 2025.

The value of U.S. imports of raw cane sugar under CBERA subject to the WTO tariff-rate quota (TRQ) decreased by 1.8 percent from \$32.9 million in 2022 to \$32.3 million in 2024. ¹⁴⁷ Imports increased 5.5 percent in 2023 before decreasing by 6.9 percent in 2024. Raw cane sugar imports subject to the WTO TRQ constituted about 15 percent of agricultural imports under CBERA in 2023 and 2024. In descending order of their 2024 import values, Guyana, Belize, Jamaica, and Barbados were the only CBERA suppliers of raw cane sugar imported subject to the WTO TRQ during those same years. U.S. imports from Guyana faced back-to-back annual decreases in 2023 and 2024 as a result of the continuing decrease in Guyanese sugarcane production amid high production costs and falling sugar prices. ¹⁴⁸ Guyana did not fill its WTO TRQ in 2023 or 2024. ¹⁴⁹ However, U.S. sugar imports from Guyana always claimed CBERA preferences, and the 2024 CBERA utilization rate for other raw cane sugar imports from Guyana was 100 percent for the third year in a row. ¹⁵⁰

U.S. imports of sauces and preparations under CBERA increased by 11.9 percent from 2022 to \$24.4 million in 2024. Imports increased 21.2 percent in 2023 before decreasing 7.7 percent in 2024. In 2023 and 2024, the sauces and preparations category comprised about 11 percent of CBERA agricultural imports. Jamaica is the largest CBERA supplier of sauces and preparations, contributing about 80 percent of 2022–24 imports under CBERA, followed by Trinidad and Tobago (7.4 percent). The United States is Jamaica's largest export market and an important destination for hot sauce (e.g., pepper sauce and jerk sauce), tomato ketchup, and other condiments. ¹⁵¹ Before 2022, imports of this product

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¹⁴⁷ Imports of raw cane sugar under 1701.14.10 require certificates issued by the USDA under the WTO TRQ allocations as determined by USTR. WTO TRQ allocations are issued annually according to historical allocations. The following CBERA countries received initial allocations during 2020–24: Barbados, Belize, Guyana, Haiti, Jamaica, Saint Kitts and Nevis, and Trinidad and Tobago. Initial allocations did not change during 2020–24. Unused initial allocations may be reallocated. For initial 2024 allocations, see 88 Fed. Reg. 46363 (July 19, 2023). For final allocations and actual quantities entered, see USDA, ERS, "Table 57–U.S. Raw Sugar Tariff-Rate Quota World Trade Organization Allocations and Entries by Month, since Fiscal Year 1982," February 19, 2025.

¹⁴⁸ Guyana's sugar industry is dominated by the state-owned entity Guyana Sugar Corporation (GuySuCo). Available production data from FAOSTAT demonstrate a 22 percent decrease in sugar cane output between 2018 and 2023. Reports indicate that GuySuCo's average costs of production (\$1.31 per pound) continued to exceed the average market price for sugar (\$0.17 per pound) in 2024 and resulted in declining production and exports. FAOSTAT, Crops and livestock products, accessed March 11, 2025; Chabrol, "GuySuCo Hopes to Reduce Cost of Sugar Production," January 31, 2025; ChiniMandi, "Guyana's Sugar Production Drop by around 21 per Cent in 2024," January 3, 2025.

¹⁴⁹ Of the 40 countries eligible to export sugar to the United States under the WTO quota, 19—including Guyana—did not fill their quota allocations in FY 2024. USDA, ERS, "Table 57–U.S. Raw Sugar Tariff-Rate Quota World Trade Organization Allocations and Entries by Month, since Fiscal Year 1982," February 19, 2025.

¹⁵⁰ Between 2014 and 2024, CBERA utilization rates for other raw sugarcane cane sugar as described in HTS subheading 1701.14.10 from Guyana averaged 40 percent, and the median was 61 percent. Before 2020, other raw cane sugar from Guyana was usually imported under the Generalized System of Preferences. USDA, ERS, "Table 57–U.S. Raw Sugar Tariff-Rate Quota World Trade Organization Allocations and Entries by Month, since Fiscal Year 1982," February 19, 2025; USDA, ERS, "Table 57–U.S. Raw Sugar Tariff-Rate Quota World Trade Organization Allocations and Entries by Month, since Fiscal Year 1982," February 19, 2025; USITC DataWeb/Census, U.S. imports for consumption, subheading 1701, accessed March 11, 2025.

¹⁵¹ This category of sauces may also include cheese sauce. CBP, NY Ruling Letter I89044, The Tariff Classification of a Cheese Sauce Base from Jamaica, December 12, 2002; USITC, *HTS (2025) Revision 3*, March 2025; UN, Trade Data, accessed March 11, 2025.

category had steadily increased, particularly as Jamaican cuisine grew in popularity in the United States. 152

¹⁵² Ewing-Chow, "Caribbean Scotch Bonnet Is So 'Hot,'" November 26, 2020; South Florida Caribbean News, "New Jamaican Sauce, Pedro Plains Hits U.S. Grocery Stores," January 27, 2017.

Chapter 3 Economic Impact of CBERA on U.S. **Economy, Industries, and Consumers**

This chapter reports on the economic impact of the Caribbean Basin Economic Recovery Act (CBERA) program on U.S. imports, industries, and consumers in 2023–24. 153 It includes a quantitative assessment of the program's effect on imports from CBERA countries during that period, as well as the program's effect on specific industries within the United States. 154 It also includes the Commission's assessment of the probable future effect that the CBERA program will have on the U.S. economy generally, as well as on specific industries. The assessment of the program's probable future effect is based on a qualitative analysis of likely economic growth and investment activity in the Caribbean Basin region, as well as on an assessment of the role that foreign investment might play in future U.S. imports under the CBERA program. Most of this investment information has been collected from international sources such as the United Nations (UN) and the International Monetary Fund (IMF) and augmented by information obtained from the Commission hearing held on February 20, 2025.

Summary of Overall Impact

The effects on the United States are organized in two categories of goods imported under the program: CBERA-exclusive goods and CBERA-nonexclusive goods. CBERA-exclusive goods are only eligible to enter the United States with a reduced duty or duty free under the CBERA program; CBERA-nonexclusive goods were also eligible to enter the United States with a reduced duty or duty free under another preference program, usually the Generalized System of Preferences (GSP). 155

For both CBERA-exclusive and CBERA-nonexclusive products, Commission modeling simulations estimate that the CBERA program had a small economic effect on the U.S. economy and on U.S. industries. Imports of CBERA-exclusive products were estimated to reduce revenue, profits, and employment in the 11 competing U.S. industries by an average of 1.2 percent. CBERA-exclusive products largely comprise apparel using some amount of U.S. yarn or fabric. 156 Therefore, the economic effect of U.S. imports of CBERA-exclusive products on U.S. yarn and fabric industries was modeled separately, showing consistent positive effects. Imports of CBERA-nonexclusive products were estimated to reduce

¹⁵³ Throughout the report, the terms "imports under CBERA," "imports under the CBERA program," and "CBERA imports" refer to CBERA-eligible products that claim preference under the CBERA program.

¹⁵⁴ Chapter 4 discusses modeling estimates of how CBERA affected export revenue and profits in CBERA beneficiary countries.

¹⁵⁵ For more information on CBERA-exclusive goods versus goods that can enter under other preference programs, such as GSP, see chapter 1. GSP preferences expired in December 2020 but may be reauthorized in the future, and imports that claim these preferences may be eligible for retroactive benefits. Although CBERA-exclusive goods largely comprise apparel products imported from Haiti, this chapter continues to use the CBERA-exclusive and CBERA-nonexclusive nomenclature from previous reports.

¹⁵⁶ CBTPA preferences require U.S. content, but HOPE/HELP preferences are more flexible. Although HOPE/HELP does not require U.S. content for most product categories, it does require use of U.S. yarn as an input in knit products, which are the largest single category of exports to the United States.

revenue, profits, and employment in the nine competing U.S. industries by an average of 0.1 percent.¹⁵⁷ The economic effect of the CBERA program on U.S. industries was small because the value of U.S. imports under the CBERA program remained a small share of total U.S. imports, at 0.06 percent of all U.S. imports in 2024.¹⁵⁸

Measured in lost revenues for U.S. producers, the economic effects of the CBERA program for CBERA-exclusive products were largest for T-shirts of manmade fibers from Haiti, showing a decline of \$2.4 million (3.0 percent of the industry's revenue). Revenues from U.S. yarn and fabric exports for T-shirts of manmade fibers, however, were estimated to increase by far more—\$13.6 million (230.4 percent of industry revenue)—as a result of CBERA. Measured in lost revenue for U.S. producers, the economic effects of the CBERA program for CBERA-nonexclusive products were largest for the methanol-producing industry, at \$13.2 million (0.4 percent of the industry's operating revenue). Complete tables of economic effects can be found in the sections below.

The future effect of CBERA on the U.S. economy, including on U.S. industries and U.S. consumers, is likely to remain minimal for most products. Predicted slower tourism growth and lower oil prices will likely constrain economic growth in CBERA beneficiaries, limiting production in those countries. ¹⁵⁹ CBERA program imports will therefore continue to make up a small share of U.S. imports, and changes in CBERA program imports are unlikely to have a notable effect on U.S. industries or consumer prices. ¹⁶⁰

In examining future supply and demand for imports under the CBERA program, the Commission analyzed 2023–24 CBERA-related investment, as well as investment trends in the CBERA beneficiaries for the near-term production and export of CBERA-eligible products. This analysis indicates that 2023–24 investment is unlikely to generate U.S. imports that will have a measurable economic impact on U.S. producers and consumers because CBERA beneficiaries generally are, and are likely to remain, small suppliers to the U.S. market. Moreover, information available to the Commission from sources mentioned above indicates that new investment in CBERA beneficiaries continues to focus on services sectors not eligible for CBERA program preferences rather than on the production of CBERA-eligible goods for export to the United States.

¹⁵⁷ CBERA-nonexclusive products largely do not include apparel products because GSP largely does not provide preferences for apparel products. These estimates are based on an analysis of the economic impact of the top 20 CBERA imports by value. For more information on the economic modeling methodologies used in this report, see appendix B.

¹⁵⁸ USITC DataWeb/Census, Harmonized Tariff Schedule of the United States (HTS).

¹⁵⁹ IMF, *Regional Economic Outlook*, October 25, 2024, 22; U.S. Energy Information Administration, *Short-Term Energy Outlook*, March 2025, 2; Reuters, "Barclays Cuts 2025 Brent Oil Price Forecast on Soft Demand View," March 14, 2025.

¹⁶⁰ The expiration of the HOPE/HELP program at the end of September 2025 would significantly reduce the competitiveness of textile and apparel exports from Haiti to the United States by removing key duty-free access provisions. Although Haiti would still be able to take advantage of the CBTPA provisions, without the HOPE/HELP program, CBERA exports of textile products are likely to decline sharply, as producers face increased production costs relative to other U.S. trading partners. These outcomes are unlikely to have a substantial effect on the U.S. economy, even though they would have a large effect on Haiti.

Economic Impact of CBERA on U.S. Imports, Consumers, and Industries

This section reports the estimated economic effects of the CBERA program on U.S. imports, U.S. consumers, and U.S. industries. The analysis uses a partial equilibrium model of the U.S. market for the top 20 imported products under the program to simulate the hypothetical scenario where imports currently claiming CBERA preference enter the United States under their normal trade relations (NTR) duty rates. ¹⁶¹ Economic effects of the program are calculated as the difference between actual outcomes and simulated outcomes. Positive numbers indicate that the program was estimated to increase those outcomes compared to the simulation scenario without the program.

Like previous CBERA reports produced by the Commission, this report presents estimated effects of CBERA on U.S. industries whose products are like or directly competitive with U.S. imports from CBERA beneficiary countries. This report, however, introduces two additional model features. It models the effect of CBERA on U.S. industries that export apparel inputs to CBERA beneficiary countries. Because CBERA beneficiary countries use these inputs in producing the apparel that they export back to the United States, a change in CBERA preferences would affect U.S. apparel input producers. The modeling in this chapter also breaks out U.S. imports under CBERA according to country of origin to show the effect of CBERA preferences on export revenues from individual CBERA beneficiaries.

In evaluating the effect of the CBERA program, the Commission chose the top 20 products according to the value of their 2024 CBERA imports (table 3.1). ¹⁶⁴ Products are specified at the 8-digit subheading level in the *Harmonized Tariff Schedule of the United States* (HTS). Chapter 3 analysis subdivides these products into CBERA-exclusive products (those eligible only under CBERA), which are primarily apparel products imported from Haiti under HOPE/HELP preferences, and CBERA-nonexclusive products (those also eligible under other trade programs), which include products in the food manufacturing, petroleum, and chemicals sectors. On average, NTR duty rates are substantially higher for CBERA-exclusive products compared to those faced by CBERA-nonexclusive products. Three HTS 8-digit subheadings in the 20 leading imports in 2024 by value were not modeled. ¹⁶⁵

¹⁶¹ Appendix B provides more technical details on the partial equilibrium model used in this chapter. Chapter 3 does not model tariff policies that were introduced in 2025 because modeling is based on 2024 data.

¹⁶² USITC, CBERA 2023, 68; USITC, CBERA 2021, September 2021, 43.

¹⁶³ Throughout this chapter, the phrase "apparel inputs" refers to U.S. production and exports of yarn and fabric. The United States does not export significant amounts of cotton to Haiti because Haiti does not have a domestic spinning industry. USITC, *U.S.-Haiti Trade*, December 2022, 113.

¹⁶⁴ The Commission also ran modeling estimates with 2023 data, but results were largely the same.

¹⁶⁵ The Commission did not model items under the following HTS subheadings: other raw cane sugar (1701.14.10), certain polyhydric alcohols (1701.14.20), and fresh or chilled yams (0714.30.10). The Commission instead added three other HTS subheadings: mixed condiments and mixed seasonings (2103.90.80), ranked the 21st-highest CBERA subheading in 2024, waters containing added sugar or other sweetening (2202.10.00), ranked 22nd-highest, and bean cakes (2008.99.91), the 23rd-highest, in its modeling analysis on the effects of CBERA products. For more information on why other raw cane sugar, certain polyhydric alcohols, and fresh or chilled yams were excluded, see appendix B.

Table 3.1 CBERA products modeled

In millions of dollars and percentages. HTS = Harmonized Tariff Schedule of the United States; n.e.s.o.i. = not elsewhere specified or included; NTR = normal trade relations.

				U.S. imports
		NTR		under CBERA
HTS		Duty	CBERA	preferences in
subheading	Description	rate (%)	exclusivity	2024 (million \$)
2709.00.10	Petroleum oils, heavy	0.1	Nonexclusive	736.2
6109.10.00	T-shirts of cotton	16.5	Exclusive	194.3
2905.11.20	Methanol	5.0	Nonexclusive	179.1
6109.90.10	T-shirts of manmade fibers	32.0	Exclusive	79.7
3903.11.00	Polystyrene	6.0	Nonexclusive	54.4
6110.30.30	Sweaters of manmade fibers, n.e.s.o.i.	32.0	Exclusive	53.4
6110.20.20	Sweaters of cotton, n.e.s.o.i.	16.5	Exclusive	53.1
6203.43.90	Men's/boys' trousers (synth fibers)	27.9	Exclusive	38.5
	Other food preps n.e.s.o.i., incl preps for the			
	manufacture of beverages, non-dairy coffee			
2106.90.99	whiteners, herbal teas and flavored honey	6.0	Nonexclusive	36.5
6205.30.20	Men's/boys' shirts of manmade fibers, n.e.s.o.i.	27.1	Exclusive	27.5
2709.00.20	Petroleum oils, light	0.1	Nonexclusive	27.5
2103.90.90	Sauces and preparations, n.e.s.o.i.	6.0	Nonexclusive	24.4
	Women's/girls' trousers (synth fibers, knitted),			
6104.63.20	n.e.s.o.i.	28.2	Exclusive	21.9
6505.00.80	Hats and headgear	7.4	Exclusive	16.4
6204.63.90	Women's/girls' trousers, n.e.s.o.i.	28.6	Exclusive	11.9
6211.43.10	Women's/girls' track suits, n.e.s.o.i.	16.0	Exclusive	9.3
	Women's/girls' shirts of manmade fibers,			
6106.20.20	n.e.s.o.i.	32.0	Exclusive	8.8
2103.90.80	Mixed condiments and mixed seasonings	6.4	Nonexclusive	8.4
	Waters, containing added sugar or other			
2202.10.00	sweetening	2.5	Nonexclusive	8.1
2008.99.91	Bean cake, bean stick, miso, other fruit, nuts	6.0	Nonexclusive	7.1

Source: USITC DataWeb/Census, imports for consumption, accessed March 19, 2025; USITC DataWeb/Census, *Harmonized Tariff Schedule of the United States* (HTS), accessed March 5, 2025.

Note: The duty rate is the ad valorem equivalent from the HTS for NTR with partner countries.

Description of the Economic Model

This chapter uses a modeling framework developed for the Commission's 2023 CBERA report, ¹⁶⁶ with slight revisions to the model intended to capture the effect of CBERA preferences on individual beneficiary countries and the effect of CBERA preferences on U.S. production of inputs used in the apparel industry. ¹⁶⁷ The partial equilibrium model used to determine these effects, along with its limitations, is described below. ¹⁶⁸ Details on estimated U.S. effects for CBERA-exclusive and CBERA-nonexclusive imports follow this discussion.

The Commission's partial equilibrium model provides a quantitative assessment of changes in U.S. tariff policy at the HTS 8-digit subheading level, analyzing each subheading separately. An HTS subheading at

¹⁶⁶ USITC, CBERA 2023, September 2023, 69-70.

¹⁶⁷ Model results in this chapter are based on 2024 data. Chapter 2 describes trade data for 2023–24.

¹⁶⁸ For technical information on the partial equilibrium model used in this analysis, see appendix B.

this level represents a product in the model. Consumers in the model purchase three varieties of each product: a domestically-produced variety, a variety imported under CBERA preferences from each CBERA-eligible country, ¹⁶⁹ and a variety imported into the United States not claiming or not eligible for CBERA preferences. Imports from the various sources and domestic production are assumed to be imperfectly substitutable. ¹⁷⁰ Producers are assumed to operate in an industry where the number of firms is fixed. Each firm produces a unique variety of the product and is thus able to charge a markup above its marginal cost of production when setting prices in the domestic market. ¹⁷¹ Because firms have some market power when setting prices, they may generate positive or negative profits in the short run, allowing the model to calculate nonzero changes in operating profits. ¹⁷² Changes in firm revenue can have a direct effect on a firm's demand for variable labor, allowing the model to also calculate counterfactual changes in the number of production-related workers. ¹⁷³ Accordingly, along with price and quantity effects, the model can determine how potential changes in tariffs could affect employment and operating profits in domestic industries. Furthermore, because the model differentiates CBERA-eligible imports by country of origin, model results can also be used to show how potential changes in tariffs would affect CBERA beneficiary countries' revenue and operating profits from exports.

Unlike previous models used by the Commission to estimate CBERA's effects, this model also simulates the effect of CBERA preferences on yarn- and fabric-producing (apparel inputs) industries in the United States. Restrictions on the sourcing of apparel inputs cause Haiti's apparel industry to use U.S.-produced yarn and fabric in producing the apparel that it then exports back to the United States. ¹⁷⁴ Because of the role U.S. apparel inputs play in Haiti's apparel industry, any change in apparel exports from Haiti would

¹⁶⁹ Several of these values are zero. For example, individual CBERA-eligible countries do not export all the modeled products to the United States. USITC DataWeb/Census, accessed March 5, 2025.

¹⁷⁰ See appendix B for more details about the estimated elasticity of substitution between foreign- and domestically-sourced varieties of a given product.

¹⁷¹ Krugman, "Increasing Returns, Monopolistic Competition, and International Trade," 1979, was the first paper that used the assumption of firms operating under monopolistic competition to model international trade flows. The paper provides a good characterization of the industries modeled in this chapter, such as the U.S. apparel industry, with highly differentiated products by brand. This assumption also allows the model to estimate effects on operating profits.

¹⁷² Operating profits are defined here as a firm's total revenue minus total variable costs.

¹⁷³ The model calculates employment effects at the subheading level, so the model cannot determine if the workers who become unemployed are then rehired by a firm that produces output under a different HTS subheading.

¹⁷⁴ All apparel products claiming CBTPA preferences must be made using U.S. inputs to enter duty free. Although HOPE/HELP preferences generally do not mandate the use of U.S. inputs for apparel production, they nonetheless maintain tariff-rate quotas for some categories—in particular knit products that comprise the largest share of U.S. apparel imports from Haiti—that require the use of U.S. or regionally made inputs. Haitian apparel producers therefore opt to source apparel inputs from the United States, and the presence of a textile industry in Haiti indirectly benefits the U.S. textile industry. CRS, *Caribbean Trade Preference Programs*, February 22, 2023, 2–4; USITC, *U.S.-Haiti Trade*, December 2022, 35; USDOC, "Trade Preferences for Haitian Textiles and Apparel," June 16, 2017; CBTPA, Articles Eligible for Preferential Treatment, 19 C.F.R. § 10.223 (2024); CRS, *The Haitian Economy and the HOPE Act*, June 24, 2010, 15; CRS, *Caribbean Trade Preference Programs*, February 22, 2023, 2; USITC, hearing transcript, February 20, 2025, 68–69 (testimony of Marc Doyon, Gildan Activewear); USITC, hearing transcript, February 20, 2025, 68–69 (testimony of Gail Strickler, Brookfield Associates). See chapter 1 for more information on rules of origin for preferences and chapter 2 for more information on apparel production in Haiti.

likely affect Haiti's demand for yarn and fabric from the United States. ¹⁷⁵ The model assumes that Haiti's apparel industry employs U.S. inputs consistently in proportion to all other inputs that it uses in its production process. Thus, an increase in U.S. apparel imports generated by CBERA would bring about a proportional increase in revenue for the yarn and fabric industry within the United States. ¹⁷⁶

The model estimates economic effects of the CBERA program by simulating a hypothetical scenario where products from CBERA beneficiaries are no longer eligible for CBERA program preferences. Because CBERA imports qualify for preferential treatment, the model's baseline is first developed using current market shares at these preferential rates, then rerun to compute a counterfactual set of quantities and prices that would prevail if CBERA program preferences were eliminated and duty rates returned to their higher NTR values. The estimated effect of the CBERA program is calculated as the difference between baseline levels of values and quantities observed under the CBERA program and those counterfactual values without CBERA program preferences. Effects are calculated separately for each of the 20 products shown in table 3.1 to account for differences in NTR tariff rates and other market characteristics for each product.

In the model, tariff reduction or elimination attributed to CBERA program preferences lead to increased imports under CBERA and lower prices for U.S. consumers, as well as reduced domestic production as a result of increased competition from the CBERA imports. The amount by which domestic prices and domestic production fall depends on the CBERA program imports' share of the U.S. domestic market, the size of NTR tariff rates, and the substitutability of domestic and imported varieties. ¹⁷⁷ In general, if imports under the CBERA program account for a larger market share in the U.S. domestic market, face higher NTR tariff rates, or are more substitutable with domestic products, then the model will estimate larger increases in U.S. imports, larger decreases in consumer prices, or larger adverse effects on domestic producers as a result of CBERA program preferences.

Limitations of the Partial Equilibrium Model. The model is designed to allow for certain factors such as tariffs, market shares, elasticities, employment, and operating profits. It does not examine the impact of CBERA program preferences on wages, inventories, capital investment, or profit margins.

Because the model is a partial equilibrium model, it considers the impact on each product in isolation and does not consider any linkages between a product's industry and other industries in the economy. Thus, the model cannot determine if the workers who become unemployed in the production of one product are then rehired by a firm that produces goods classifiable in a different HTS subheading. Similarly, the model does not include any impact on industries that are upstream or downstream from

¹⁷⁵ Most of the yarn and fabric that the United States exports to Haiti is transshipped through the Dominican Republic. Because these data are not readily available, a measure of total U.S. exports of yarn and fabric to Haiti was calculated according to U.S. exports to the Dominican Republic and the fraction of exports in apparel inputs that the Dominican Republic sends to Haiti. For more details, see appendix B. USDOC, OTEXA, (aggregate 1, total apparel; aggregate 3, total yarn; and aggregate 4, total fabric), accessed March 10, 2025; UN, Trade Data, accessed March 11, 2025.

¹⁷⁶ For example, if imports of T-shirts from Haiti were to decrease by 25 percent, the model assumes that imports of U.S. apparel inputs to Haiti would decline by 25 percent as well. See appendix B for a technical description of this assumption.

¹⁷⁷ The Commission estimated domestic production and employment data for each HTS 8-digit subheading to match the level of aggregation of imports. For more details on estimation procedures, see appendix B.

the directly affected industry, with the exception of U.S. yarn and fabric production as upstream inputs for Haitian apparel production.

The model is more appropriate for industries in which many firms compete and have limited market power and may not be appropriate for industries characterized by significant market power held by a few firms. However, with the exception of petroleum, the 20 industries modeled in this chapter are not generally characterized as having a few firms with significant market power.

Because of limitations in data availability, initial calibrations must incorporate simplifying assumptions about U.S. industry structure. Data on domestic revenue and production workers are generally available for U.S. industries that are classified under a more aggregate level—such as the North American Industry Classification System (NAICS) 6-digit level—rather than under the HTS 8-digit subheading level at which imports under the CBERA program are classified.¹⁷⁸ To estimate the number of production workers in domestic industries that compete with the 20 products modeled, the Commission assumed that labor productivities were the same for all industries classified within an NAICS 6-digit industry corresponding to a particular HTS 8-digit subheading. Furthermore, the precise value of U.S. yarn and fabric exports to Haiti is not observable because a large fraction of these exports pass through the Dominican Republic before arriving in Haiti, requiring an approximation as described in appendix B.¹⁷⁹

The model can estimate only the short-term effects on market participants from changes in tariffs; long-term changes arising in the industry from firm entry/exit, investments, and offshoring are not considered. With respect to profitability analysis, the model may underestimate the effect of duty elimination on a U.S. industry in situations where U.S. firms operate under small profit margins; low profitability may indicate that the industry is less able to adjust to increased competition from imports. Furthermore, this chapter reports the effects on operating profits only, because estimating the effect on net profits requires additional information on initial profit margins, which is generally not publicly available. ¹⁸⁰

Effect on CBERA-Exclusive Products

Eleven of the 20 products most imported using CBERA preferences in 2024 were CBERA-exclusive products, and all these CBERA-exclusive products were apparel products imported from Haiti (table 3.2).

¹⁷⁸ The HTS code is a U.S. classification of international trade data that is based on the World Customs Organization's *Harmonized Commodity Description and Coding System*. In contrast, NAICS is a U.S. classification of domestic economic activity. Trade and production data therefore may not always match.

¹⁷⁹ The United States exported about \$488 million worth of yarn and fabric to the Dominican Republic in 2024, but only \$11 million worth of yarn and fabric to Haiti. Furthermore, the Dominican Republic was the largest supplier of yarn and fabric to Haiti during the time period covered by this report, and industry testimony has noted the Dominican Republic's role as an intermediary in shipments of U.S. yarn and fabric to Haiti. USDOC, OTEXA, (aggregate 1, total apparel; aggregate 3, total yarn; and aggregate 4, total fabric), accessed March 10, 2025; USITC, U.S.-Haiti Trade, December 2022, 119; USITC, hearing transcript, February 20, 2025, 68 (testimony of Marc Doyon, Gildan Activewear); USITC, hearing transcript, February 20, 2025, 90 (testimony of Beth Hughes, AAFA); USITC, hearing transcript, February 20, 2025, 69, 71 (testimony of Gail Strickler, Brookfield Associates).

¹⁸⁰ Operating profits are defined as a firm's total revenue minus variable costs; net profits, as a firm's total revenue minus both variable costs and fixed costs; and profit margins, as net profits divided by total revenue. The Commission has undertaken more extensive profitability analysis in other investigations that look at net profits, but such analysis required confidential business information from the relevant industry.

The relevant subheadings accounted for 87 percent of total U.S. imports of CBERA-exclusive products from CBERA countries. ¹⁸¹ The three leading apparel subheadings in 2024 were T-shirts of cotton, T-shirts of manmade fibers, and sweaters of manmade fibers, and these subheadings composed about 64 percent of total imports of CBERA-exclusive products from CBERA countries. ¹⁸²

The economic impacts reported in <u>table 3.2</u> are the differences between observed 2024 values and a simulated counterfactual scenario without CBERA program preferences, where tariff rates return to the NTR rate. For example, as shown in <u>table 3.2</u>, actual imports under the CBERA program for cotton T-shirts were \$194.3 million in 2024. Absent CBERA preferences, tariffs on cotton T-shirts would have reverted to an NTR rate of 16.5 percent; the model estimates that imports of cotton T-shirts would have been \$101.0 million under this scenario. Hence, the model estimates that, in 2024, U.S. imports of cotton T-shirts were \$93.3 million, or 92.4 percent, higher than they would have been in the absence of all CBERA program preferences.

Estimated Effect on U.S. Imports. Table 3.2 reports the estimated economic effect of the CBERA program on CBERA-exclusive imports. On average, U.S. imports of the most imported CBERA-exclusive products increased by 199.6 percent as a result of the CBERA program's average tariff reduction of 24.0 percent. The largest increase in percentage terms was in imports of sweaters of manmade fibers, which are estimated to be 659.4 percent higher, compared to numbers in the absence of CBERA preferences. Meanwhile, the largest increase in imports by value was in cotton T-shirts, whose imports are estimated to be \$93.3 million higher in the absence of the NTR tariff of 16.5 percent. Counterfactual percentage changes in CBERA imports tend to be higher for subheadings with higher NTR duty rates. For example, items in the hats and headgear subheading would face the lowest NTR duty rate of all 11 products and produce the smallest counterfactual percentage change in CBERA imports.

¹⁸¹ USITC DataWeb/Census, Harmonized Tariff Schedule of the United States (HTS).

¹⁸² These apparel products were imported under HTS subheadings 6109.10.00, 6109.90.10, and 6110.30.30. USITC DataWeb/Census, accessed March 19, 2025.

Table 3.2 Estimated effect of the CBERA program on U.S. imports, CBERA-exclusive products, 2024 In millions of dollars and percentages. HTS = *Harmonized Tariff Schedule of the United States*; n.e.s.o.i. = not elsewhere specified or included; NTR = normal trade relations.

HTS subheading	Description	NTR duty rate (%)	Actual CBERA imports (million \$)	Estimated imports without CBERA (million \$)	Change in imports due to CBERA (million \$)	Change in imports due to CBERA (%)
6109.10.00	T-shirts of cotton	16.5	194.3	101.0	93.3	92.4
6109.90.10	T-shirts of manmade fibers	32.0	79.7	24.1	55.6	230.4
6110.30.30	Sweaters of manmade fibers, n.e.s.o.i.	32.0	53.4	7.0	46.4	659.4
6110.20.20	Sweaters of cotton, n.e.s.o.i.	16.5	53.1	17.4	35.7	205.2
6203.43.90	Men's/boys' trousers (synth fibers) Men's/boys' shirts of manmade	27.9	38.5	7.9	30.6	388.4
6205.30.20	fibers, n.e.s.o.i.	27.1	27.5	9.8	17.8	182.1
6104.63.20 6505.00.80	Women's/girls' trousers (synth fibers, knitted), n.e.s.o.i. Hats and headgear	28.2 7.4	21.9 16.4	9.4 13.1	12.4 3.3	131.8 25.5
0303.00.00	Women's/girls' trousers,	7.4	10.4	13.1	5.5	23.3
6204.63.90	n.e.s.o.i. Women's/girls' track suits,	28.6	11.9	7.7	4.3	55.6
6211.43.10	n.e.s.o.i.	16.0	9.3	6.4	3.0	47.0
6106.20.20	Women's/girls' shirts of manmade fibers, n.e.s.o.i.	32.0 24.0	8.8 46.8	3.2 18.8	5.6 28.0	177.6 199.6
Average	_	24.0	40.8	18.8	28.0	199.6

Source: USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025; USITC DataWeb/Census, *Harmonized Tariff Schedule of the United States* (HTS), accessed March 5, 2025. Estimated effects are obtained from the USITC's modeling analysis.

Notes: Actual imports are based on the imports for consumption that qualified for trade preferences under the CBERA program. The duty rate is the ad valorem equivalent from the *Harmonized Tariff Schedule of the United States* (HTS) for NTR partner countries. Economic effects are estimated using a partial equilibrium model of the U.S. industry for each product, where the estimated import value is the modeled outcome from a hypothetical scenario in which CBERA preferences are removed. The estimated change is calculated as (baseline import value minus estimated import value)/estimated import value. The estimated changes in this table are calculated in the model using unrounded outcomes, which may result in small differences from percentage changes calculated with rounded figures.

The estimated effects of CBERA on CBERA-exclusive imports were generally quite large, with imports of the most imported products around three times higher on average than they would have been in the absence of CBERA preferences. ¹⁸³ The Haiti HOPE and HELP Acts allow for more flexibility in the sourcing

¹⁸³ The counterfactual percentage changes in CBERA-exclusive imports as a result of CBERA cannot be compared directly with the percentage changes in the 2023 report. Estimates were, on average, substantially higher than in 2023 because of a reversion to a previous methodology in how elasticities of substitution between different regions were calculated. Elasticity estimation with the method used in 2023 would not have been possible with recent data; furthermore, the methodology used in this report allowed elasticities to be computed at a more disaggregated product level. Because the Commission's 2021 CBERA report used an elasticity method similar to the one used in this report, a direct comparison between results in <u>table 3.2</u> and results from 2021 is possible. USITC, *CBERA 2023*, September 2023, 147; USITC, *CBERA 2021*, September 2021, 147–48. For more details, see appendix B.

of inputs compared to other trade preference programs; ¹⁸⁴ because Haiti accounts for virtually all CBERA-exclusive imports, this flexibility plays a major role in facilitating the export of CBERA-exclusive products to the United States. Apparel manufacturers have emphasized the importance of preferences under the HOPE and HELP Acts for Haiti's apparel industry, stating that a removal of these preferences would pose an existential threat to their industry. ¹⁸⁵

<u>Table 3.2</u> presents short-term estimates only. As noted in the limitations section above, the model cannot determine long-term industry changes caused as a result of new firms entering the market or current firms exiting. The counterfactual effects on imports in <u>table 3.2</u> should therefore be considered to be conservative estimates of the potential effects of CBERA, and the long-term effects of removing CBERA program preferences would likely be even larger than what the modeling predicts.

Estimated Effect on U.S. Consumers. Table 3.3 reports the estimated percentage changes in the aggregate price that U.S. consumers paid for imports claiming CBERA preferences of each of the 11 leading CBERA-exclusive products. ¹⁸⁶ The CBERA program caused an overall slight reduction (0.3 percent) in 2024 average consumer prices of CBERA-exclusive products, because products imported under CBERA did not constitute a large fraction of overall U.S. imports. T-shirts of manmade fibers saw the largest decline in consumer prices of 0.7 percent; all other products saw price decreases of 0.5 percent or lower. T-shirts of manmade fibers likely displayed the largest decrease in consumer prices because imports under this subheading claiming CBERA preferences accounted for a relatively larger share of U.S. consumption in 2024 (4.2 percent) compared to imports claiming CBERA preferences of the other products in table 3.3 and faced a relatively high NTR duty rate of 32.0 percent.

¹⁸⁴ USITC, *U.S.-Haiti Trade*, December 2022, 35; CRS, *Caribbean Trade Preference Programs*, February 22, 2023, 5–6; CRS, *The Haitian Economy and the HOPE Act*, June 24, 2010, 16–17; USDOC, "Trade Preferences for Haitian Textiles and Apparel," June 16, 2017. For more information, see Chapter 2.

¹⁸⁵ USITC, hearing transcript, February 20, 2025, 60–62 (testimony of Wilhelm Lemke, ADIH).

¹⁸⁶ The aggregate price includes prices for imports from CBERA beneficiaries, imports from the rest of the world, and domestic prices. See technical appendix B for more details.

Table 3.3 Estimated impact of the CBERA program on U.S. consumers, CBERA-exclusive products, 2024 In percentages. — (em dash) = not applicable; n.e.s.o.i. = not elsewhere specified or included; NTR = normal trade relations.

			Change in
		NTR duty	consumer prices
HTS subheading	Description	rate (%)	due to CBERA (%)
6109.10.00	T-shirts of cotton	16.5	-0.4
6109.90.10	T-shirts of manmade fibers	32.0	-0.7
6110.30.30	Sweaters of manmade fibers, n.e.s.o.i.	32.0	-0.1
6110.20.20	Sweaters of cotton, n.e.s.o.i.	16.5	-0.1
6203.43.90	Men's/boys' trousers (synth fibers)	27.9	-0.3
6205.30.20	Men's/boys' shirts of manmade fibers, n.e.s.o.i.	27.1	-0.5
6104.63.20	Women's/girls' trousers (synth fibers, not knitted), n.e.s.o.i.	28.2	-0.2
6505.00.80	Hats and headgear	7.4	-0.1
6204.63.90	Women's/girls' trousers, n.e.s.o.i.	28.6	-0.2
6211.43.10	Women's/girls' track suits, n.e.s.o.i.	16.0	-0.2
6106.20.20	Women's/girls' shirts of manmade fibers, n.e.s.o.i.	32.0	-0.2
Average	_	24.0	-0.3

Source: USITC DataWeb/Census, Harmonized Tariff Schedule of the United States (HTS), accessed March 5, 2025. Estimated effects are obtained from the USITC's modeling analysis.

Notes: Actual imports are based on the imports for consumption that qualified for trade preferences under the CBERA program. The duty rate is the ad valorem equivalent from the Harmonized Tariff Schedule of the United States (HTS) for NTR partner countries. Economic effects are estimated using a partial equilibrium model of the U.S. industry for each product. The estimated change is calculated as (baseline consumer price minus estimated consumer price)/estimated consumer price. The estimated changes in this table are calculated in the model using unrounded outcomes, which may result in small differences from percentage changes calculated with rounded figures.

Estimated Effect on U.S. Industry. Overall, estimates of potential adverse effects on the U.S. domestic apparel industry from an increase in CBERA-exclusive imports in 2024 were small (table 3.4). The average decrease in revenues, operating profits, and employment of production workers 187 for the top CBERA-exclusive imports was about 1.2 percent. Among the products modeled, T-shirts of manmade fibers saw the largest percentage decrease in revenue, employment, and profits at 3.0 percent, and Tshirts of cotton saw a decrease of 2.0 percent. Revenue and profit from the production of T-shirts of manmade fibers went down by \$2.4 million and \$0.4 million respectively, higher decreases than those of any other product.

¹⁸⁷ Note that, because of features of the model, the decrease in percentage terms for operating profits and production workers is estimated to be the same for each product modeled.

Table 3.4 Estimated effect of the CBERA program on U.S. industries, CBERA-exclusive products, 2024 In millions of dollars, percentages, and numbers. HTS = *Harmonized Tariff Schedule of the United States*; — (em dash) = not applicable; n.e.s.o.i. = not elsewhere specified or included.

				A		Oh a sa a a i'u	Change in	Change in	Change in
		D	A -41	Actual	A -41	Change in	operating	workers	revenue,
LITC		Duty	Actual	operating	Actual	revenues	•	due to	profits,
HTS		rate	revenues	profits	workers	due to CBERA	CBERA	CBERA	
subheading	Description	(%)	(million \$)	(million \$)	(no.)	(million \$)	(million \$)		to CBERA (%)
6109.10.00	T-shirts of cotton	16.5	55.2	10.2	1,365	-1.1	-0.2	-27	-2.0
6109.90.10	T-shirts of manmade fibers	32.0	78.3	14.5	291	-2.4	-0.4	-9	-3.0
	Sweaters of manmade fibers,								
6110.30.30	n.e.s.o.i.	32.0	162.5	19.5	1,112	-1.6	-0.2	-11	-1.0
6110.20.20	Sweaters of cotton, n.e.s.o.i.	16.5	253.1	30.4	1,459	-1.2	-0.1	-7	-0.5
	Men's/boys' trousers (synth								
6203.43.90	fibers)	27.9	85.2	11.3	783	-1.5	-0.2	-14	-1.7
	Men's/boys' shirts of manmade								
6205.30.20	fibers, n.e.s.o.i.	27.1	20.1	3.7	340	-0.5	-0.1	-8	-2.3
	Women's/girls' trousers (synth								
6104.63.20	fibers, knitted), n.e.s.o.i.	28.2	82.7	18.7	208	-0.6	-0.1	-1	-0.7
6505.00.80	Hats and headgear	7.4	54.4	12.8	528	-0.2	0.0	-2	-0.3
6204.63.90	Women's/girls' trousers, n.e.s.o.i.	28.6	55.4	20.0	125	-0.2	-0.1	0	-0.4
	Women's/girls' track suits,								
6211.43.10	n.e.s.o.i.	16.0	21.1	5.8	82	-0.1	0.0	0	-0.4
	Women's/girls' shirts of								
6106.20.20	manmade fibers, n.e.s.o.i.	32.0	25.7	5.5	580	-0.2	0.0	-4	-0.7
Average	_	24.0	81.3	13.9	625	-0.9	-0.1	-8	-1.2

Source: USITC DataWeb/Census, *Harmonized Tariff Schedule of the United States* (HTS), accessed March 5, 2025. Estimated effects are obtained from the USITC's modeling analysis. Notes: The duty rate is the ad valorem equivalent from the *HTS* for normal trade relations partner countries. The number of workers refers to an estimate of the number of domestic production-related workers for each product. Profits refer to operating profits computed as total revenues minus total variable costs. The estimated changes in this table are calculated in the model using unrounded outcomes, which may result in small differences from percentage changes calculated with rounded figures.

While CBERA program preferences had a large positive effect on U.S. imports of CBERA-exclusive products, this increase in imports did not strongly affect U.S. domestic production of those products. The small effects of CBERA-exclusive imports on U.S. industries are a direct result of these imports composing a very small share of the U.S. domestic market (about 1.2 percent on average).

Table 3.5 displays estimated effects of CBERA program preferences on U.S. exports of apparel inputs to Haiti, as well as on the number of workers used in producing those exports. Results show the specific role that U.S. firms producing yarn and fabric played in Haiti's exports of the products corresponding to each HTS 8-digit subheading. For example, the first row in table 3.5 shows HTS subheading 6109.10.00, which includes T-shirts of cotton. The model finds that U.S. firms exported \$47.5 million of yarn and fabric used to produce these T-shirts in Haiti, employing 114 U.S. workers in doing so. Without CBERA program preferences, U.S. exports of yarn and fabric used to produce T-shirts of cotton in Haiti would have been \$22.8 million lower, and 55 fewer workers would have been employed. This change in export revenues and workers represents an increase of 92.3 percent over what these values would have been without CBERA.

Overall, <u>table 3.5</u> estimates show that U.S. yarn and fabric exports worth \$126.0 million were used in the production of Haiti's apparel exports to the United States, representing around one-quarter of the total value of apparel exports from Haiti presented in <u>table 3.1</u>. ¹⁸⁹ The CBERA program contributed \$75.4 million to U.S. exports of apparel inputs to Haiti, and led to U.S. firms hiring about 181 more workers. Because the model assumes U.S. exports of apparel inputs to Haiti to be proportional to Haiti's apparel exports to the United States, men's/boys' trousers and sweaters of manmade fibers are estimated to have the largest increase in export revenues and export production workers by percentage as a result of CBERA, with the number of workers increasing by 18 and 27, respectively. T-shirts of cotton—the most exported product—are also estimated to have the largest increase in revenues and workers by value, with the CBERA program estimated to increase export revenues by \$22.8 million and production workers by 55. ¹⁹⁰

¹⁸⁸ According to the hearing testimony and observed program usage, importers of apparel from Haiti rely almost entirely on preferences granted by the HOPE/HELP program and they use U.S.-made yarn and fabric to produce a portion of the woven apparel and possibly other apparel they export to the U.S. market. The model assumes that in the absence of CBERA program preferences, Haitian producers would import significantly lower quantities of U.S apparel inputs. USITC, hearing transcript, February 20, 2025, 67–68 (testimony of Marc Doyon, Gildan Activewear); USITC, hearing transcript, February 20, 2025, 68 (testimony of Gail Strickler, Brookfield Associates).

¹⁸⁹ Adding up the U.S. import values in <u>table 3.1</u> for all 11 HTS subheadings related to apparel produces a total of about \$514.8 million. The estimated \$126.0 million of U.S. yarn and fabric exports to Haiti constitutes slightly less than 25 percent of this total. For more details, see appendix B.

¹⁹⁰ In the absence of CBERA preferences, some fraction of the U.S. yarn and fabric used to produce apparel in Haiti would instead be used to produce domestic apparel or non-CBERA imports of apparel. This usage of U.S. yarn and fabric inputs for apparel would offset the negative impact on U.S. yarn and fabric production of removing CBERA preferences, or alternatively the positive effect of implementing CBERA preferences. Furthermore, an increase in apparel imports under the CBERA program is assumed to bring about the same proportional increase in yarn and fabric exports under all subheadings—even subheadings that do not require U.S. content to meet the applicable rule of origin under the CBERA program—and this proportional increase could be an overestimate or underestimate, depending on a given subheading's actual relative demand for U.S. inputs. The estimated input requirements are based on estimated aggregate use—not statutory requirements—and are not estimated separately for individual subheadings.

Table 3.5 Estimated effect by product of the CBERA program on U.S. yarn and fabric workers and on U.S. yarn and fabric industries' exports to Haiti, 2024

In millions of dollars, percentages, and numbers. HTS = Harmonized Tariff Schedule of the United States; — (em dash) = not applicable; n.e.s.o.i. = not elsewhere specified or included.

				Change in U.S.		
HTS subheading	Description	Actual U.S. export revenues (million \$)		export revenues due to CBERA (million \$)	Change in U.S. workers due to CBERA (#)	Change in U.S. workers, export revenues (%)
6109.10.00	T-shirts of cotton	47.5	114	22.8	55	92.4
6109.90.10	T-shirts of manmade fibers	19.5	47	13.6	33	230.4
6110.30.30	Sweaters of manmade fibers, n.e.s.o.i.	13.1	31	11.4	27	659.4
6110.20.20	Sweaters of cotton, n.e.s.o.i.	13.0	31	8.7	21	205.2
6203.43.90	Men's/boys' trousers (synth fibers) Men's/boys' shirts of manmade fibers,	9.4	23	7.5	18	388.4
6205.30.20	n.e.s.o.i. Women's/girls' trousers (synth fibers,	6.7	16	4.3	10	182.1
6104.63.20	knitted), n.e.s.o.i.	5.4	13	3.0	7	131.8
6505.00.80	Hats and headgear	4.0	10	0.8	2	25.5
6204.63.90	Women's/girls' trousers, n.e.s.o.i.	2.9	7	1.0	3	55.6
6211.43.10	Women's/girls' track suits, n.e.s.o.i. Women's/girls' shirts of manmade fibers,	2.3	6	0.7	2	47.0
6106.20.20	n.e.s.o.i.	2.2	5	1.4	3	177.6
Total	_	126.0	303	75.4	181	148.9

Source: Estimated effects are obtained from the USITC's modeling analysis.

Notes: Export revenue refers to an estimate of the revenue from exporting U.S. yarn and fabric to be used in the production under a given HTS 8-digit apparel subheading, such as T-shirts of cotton or hats and headgear. The number of U.S. workers refers to an estimate of the number of export-related workers in the U.S. yarn and fabric industries whose yarn and fabric output goes into production under a given HTS 8-digit apparel subheading. The estimated changes in this table are calculated in the model using unrounded outcomes, which may result in small differences from percentage changes calculated with rounded figures.

Effect on CBERA-Nonexclusive Products

Nine of the top 20 products by CBERA import value in 2024 were CBERA-nonexclusive products and included petroleum oils, methanol, polystyrene, and food manufactures such as sauces (table 3.1). These modeled products constituted about 87 percent of CBERA-nonexclusive imports and about 59 percent of total U.S. imports under CBERA program preferences in 2024. Heavy petroleum oils alone accounted for 40 percent.¹⁹¹

Estimated Effect on U.S. Imports. Table 3.6 reports the estimated economic effect of the CBERA program on 2024 U.S. imports under the nine CBERA-nonexclusive subheadings modeled. On average, U.S. imports under these subheadings increased by 12.8 percent as a result of the removal of average NTR duties of 4.2 percent. Imports classifiable under HTS subheading 2106.90.99, which includes preparations for the manufacture of beverages, non-dairy coffee whiteners, herbal teas, and flavored honey, saw the largest percentage increase of 39.5 percent from the removal of NTR tariffs; methanol saw the largest increase in imports by value of \$13.9 million. Because the NTR duty rates are low, imports of light and heavy petroleum oils saw small gains as a result of CBERA preferences, with both types of petroleum oil seeing an increase in imports below \$3 million. These gains in imports are negligible compared to U.S. consumer expenditure on crude oil. 193

Estimated effects of the CBERA program on CBERA-nonexclusive imports were much smaller than the estimated effects on CBERA-exclusive imports (table 3.2). Relatively more restrictive rules of origin mean compliance costs are higher for preferences under CBERA than for preferences under the HOPE/HELP program that Haiti uses to export CBERA-exclusive products. These higher compliance costs and the availability of alternative provisions mean other CBERA-eligible countries sometimes export to the United States without claiming CBERA preferences, indicating that CBERA plays a less important role in facilitating exports of goods from those countries to the United States. ¹⁹⁴ Furthermore, NTR tariffs on CBERA-nonexclusive imports are generally lower than NTR tariffs on CBERA-exclusive imports, with an average of 4.2 percent compared with 24.0 percent, so the removal of these tariffs would have a smaller impact on trade. ¹⁹⁵

¹⁹¹ USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025.

¹⁹² These results likely overestimate the impact because removing CBERA preferences would not remove the ability to import under another preference program.

¹⁹³ USITC DataWeb/Census, HTS chapter 27, mineral fuels, accessed May 1, 2025; EIA, "Crude Oil Production," accessed March 4, 2025.

¹⁹⁴ USITC, hearing transcript, February 20, 2025, 105–6 (testimony of Ann-Dawn Young Sang, AmCham Jamaica).

¹⁹⁵ USITC DataWeb/Census, Harmonized Tariff Schedule of the United States (HTS).

Table 3.6 Estimated effect of the CBERA program on U.S. imports, CBERA-nonexclusive products, 2024 In millions of dollars and percentages. HTS = *Harmonized Tariff Schedule of the United States*; NTR = normal trade relations; — (em dash) = not applicable; n.e.s.o.i. = not elsewhere specified or included; NTR = normal trade relations.

			Actual CBERA	Estimated imports	Change in imports due	Change in imports
HTS		NTR duty	imports	without CBERA	to CBERA	due to
subheading	Description	rate (%)	(million \$)	(million \$)	(million \$)	CBERA (%)
2709.00.10	Petroleum oils, heavy	0.1	736.2	733.5	2.8	0.4
2905.11.20	Methanol	5.0	179.1	165.2	13.9	8.4
3903.11.00	Polystyrene	6.0	54.4	46.9	7.6	16.1
	Other food preps n.e.s.o.i., incl. preps for the manufacture of beverages, non-dairy coffee whiteners, herbal teas and flavored					
2106.90.99	honey	6.0	36.5	26.1	10.3	39.5
2709.00.20	Petroleum oils, light	0.1	27.5	27.3	0.2	0.6
	Sauces and preparations,					
2103.90.90	n.e.s.o.i.	6.0	24.4	21.7	2.7	12.4
2103.90.80	Mixed condiments and mixed seasonings	6.4	8.4	7.4	1.0	13.3
	Waters, containing added					
2202.10.00	sugar or other sweetening	2.5	8.1	7.7	0.4	4.5
2008.99.91	Bean cake, bean stick, miso, other fruit, nuts	6.0	7.1	5.9	1.2	19.9
Average	_	4.2	120.2	115.7	4.4	12.8

Source: USITC DataWeb/Census, Imports for consumption, accessed March 19, 2025; USITC DataWeb/Census, Harmonized Tariff Schedule of the United States (HTS), accessed March 5, 2025. Estimated effects are obtained from the USITC's modeling analysis.

Notes: Actual imports are based on the imports for consumption that qualified for trade preferences under the CBERA program. The duty rate is the ad valorem equivalent from the Harmonized Tariff Schedule of the United States (HTS) for normal trade relations partner countries. Economic effects are estimated using a partial equilibrium model of the U.S. industry for each product, where the estimated import value is the modeled outcome from a hypothetical scenario where CBERA preferences are removed. These results likely overestimate the impact because removing CBERA preferences would not remove the ability to import under another preference program. However, with the Generalized System of Preferences not in effect during the period of analysis, most products would not receive reduced or zero duties on these products through non-CBERA programs. The estimated change is calculated as (baseline import value – estimated import value)/estimated import value. The estimated percentage changes in this table are calculated in the model using unrounded outcomes, which may result in small differences from percentage changes calculated with rounded figures.

Estimated Effect on U.S. Consumers. <u>Table 3.7</u> reports the percentage changes in prices for consumers of the leading CBERA-nonexclusive imports. Because of their lower NTR duty rates and relatively small share of the U.S. domestic market, imports of these products had a small effect on consumer prices. Methanol and polystyrene, two CBERA imports that constituted a relatively higher fraction of the U.S. market, saw price decreases of 0.2 percent; all other price declines were negligible.

Table 3.7 Estimated effect of the CBERA program on U.S. consumers, CBERA-nonexclusive products, 2024

In percentages. HTS = Harmonized Tariff Schedule of the United States; NTR = normal trade relations; — (em dash) = not applicable; n.e.s.o.i. = not elsewhere specified or included; NTR = normal trade relations.

			Change in consumer
HTS subheading	Description	NTR duty rate (%)	
2709.00.10	Petroleum oils, heavy	0.1	0.0
2905.11.20	Methanol	5.0	-0.2
3903.11.00	Polystyrene	6.0	-0.2
	Other food preps n.e.s.o.i., incl preps for the manufacture of		
2106.90.99	beverages, non-dairy coffee whiteners, herbal teas and flavored honey	6.0	0.0
2709.00.20	Petroleum oils, light	0.1	0.0
2103.90.90	Sauces and preparations, n.e.s.o.i.	6.0	0.0
2103.90.80	Mixed condiments and mixed seasonings	6.4	0.0
2202.10.00	Waters, containing added sugar or other sweetening	2.5	0.0
2008.99.91	Bean cake, bean stick, miso, other fruit, nuts	6.0	0.0
Average	_	4.2	0.0

Source: USITC DataWeb/Census, Harmonized Tariff Schedule of the United States (HTS), accessed March 5, 2025. Estimated effects are obtained from the USITC's modeling analysis.

Note: The duty rate is the ad valorem equivalent from the Harmonized Tariff Schedule of the United States (HTS) for normal trade relations partner countries. Economic effects are estimated using a partial equilibrium model of the U.S. industry for each product. The estimated change is calculated as (baseline consumer price minus estimated consumer price)/estimated consumer price. The estimated changes in this table are calculated in the model using unrounded outcomes, which may result in small differences from percentage changes calculated with rounded figures.

Estimated Effect on U.S. Industry. The CBERA program in 2024 had a small effect on U.S. domestic industries for the nine nonexclusive subheadings modeled (table 3.8). The average percentage decrease in revenues, operating profits, and the number of production workers for the nine U.S. industries competing with these products was negligible, with only methanol and polystyrene showing a change above 0.1 percent. Items under two HTS subheadings, other food preparations and methanol, displayed the highest revenue decreases in value terms, with revenues decreasing by \$7.4 million and \$13.2 million, respectively. The overall negligible effects of CBERA-nonexclusive imports on U.S. industries were primarily because these imports composed a very small share of the U.S. domestic market. Imports of CBERA-nonexclusive products on average represented less than 1 percent of the U.S. domestic market in 2024.

 Table 3.8 Estimated effect of the CBERA program on U.S. industries, CBERA-nonexclusive products, 2024

In millions of dollars, percentages, and numbers. HTS = Harmonized Tariff Schedule of the United States; NTR = normal trade relations; — (em dash) = not applicable; n.e.s.o.i. = not elsewhere specified or included.

HTS subheading	Description	NTR duty rate (%)	Actual revenues (million \$)	Actual profits (million \$)	Actual U.S. workers (#)	Change in revenues due to CBERA (million \$)	Change in profits due to CBERA (million \$)	Change in U.S. workers due to CBERA (#)	Change in revenues, profits, U.S. workers due to CBERA (%)
2709.00.10	Petroleum oils, heavy	0.1	11,698	2,034	4,900	-0.3	-0.1	0	0.0
2905.11.20	Methanol	5.0	3,424	1,252	1,489	-13.2	-4.8	-6	-0.4
3903.11.00	Polystyrene Other food preps n.e.s.o.i., incl preps for the manufacture of beverages, non-dairy coffee whiteners, herbal teas and	6.0	1,340	367	735	-6.1	-1.7	-3	-0.5
2106.90.99	flavored honey	6.0	16,289	2,424	42,504	-7.4	-1.1	-19	0.0
2709.00.20	Petroleum oils, light	0.1	243,962	42,429	76,000	-0.1	0.0	0	0.0
2103.90.90	Sauces and preparations, n.e.s.o.i.	6.0	13,012	4,324	19,291	-2.4	-0.8	-4	0.0
2103.90.80	Mixed condiments and mixed seasonings	6.4	15,111	5,022	25,417	-1.0	-0.3	-2	0.0
2202.10.00	Waters, containing added sugar or other sweetening	2.5	2,027	720	23,303	-0.2	-0.1	-2	0.0
2008.99.91	Bean cake, bean stick, miso, other fruit, nuts	6.0	1,160	281	1,522	-0.7	-0.2	-1	-0.1
Average	<u> </u>	4.2	34,225	6,539	21,685	-3.5	-1.0	-4	-0.1

Source: USITC DataWeb/Census, Harmonized Tariff Schedule of the United States (HTS), accessed March 5, 2025. Estimated effects are obtained from USITC's modeling analysis.

Note: The duty rate is the ad valorem equivalent from the Harmonized Tariff Schedule of the United States (HTS) for normal trade relations partner countries. The number of U.S. workers refers to an estimate of the number of domestic production-related U.S. workers for each product. Profits refer to operating profits computed as total revenues minus total variable costs. The estimated changes in this table are calculated in the model using unrounded outcomes, which may result in small differences from percentage changes calculated with rounded figures.

Assessment of the Probable Future Effect of CBERA on the U.S. Economy Generally and on U.S. Domestic Industries

Overview

The probable future effect of the CBERA program on U.S. domestic industries and U.S. consumers is likely to be similar to the current effect at the present level for most products. ¹⁹⁶ CBERA beneficiaries are small producers in the global context and small suppliers of U.S. imports. This is unlikely to change following projected changes in CBERA supply and U.S. demand for imports under the CBERA program. The IMF forecasts that U.S. economic growth will likely slow down from 2025 to 2029, though it is unlikely to significantly affect imports under the CBERA program because of the small share of total U.S. imports attributable to CBERA. CBERA beneficiaries are also likely to experience limited growth in supply in the coming years. Foreign direct investment (FDI) is unlikely to have a significant impact on CBERA goods because most investments are focused in the services sector, as noted in the previous Commission report.

Analytical Framework and Data Sources

Assuming no changes in duties or transportation costs, future U.S. imports under the CBERA program are determined by future import demand in the United States, along with future supply by the CBERA beneficiaries. The analysis in this section discusses potential changes in U.S. demand as well as changes in CBERA beneficiaries' future export supply levels. Beginning with U.S. demand, this section uses U.S. gross domestic product (GDP) growth projections as a proxy for future growth of U.S. imports under CBERA. This analysis assumes that changes in demand for CBERA imports in the United States are positively associated with increases in U.S. GDP. Analysis on the supply side focuses on two major determinants of future supply from CBERA beneficiaries: economic growth independent of any CBERA effects and FDI. First, by considering economic growth, this analysis can indicate the likely growth in supply of CBERA imports due to overall economic expansion in beneficiary countries. All else being equal, GDP growth in any CBERA beneficiary is likely to increase that country's production capacity for exports destined for the United States. Second, in addition to GDP growth in CBERA beneficiaries, growth in FDI stock can serve as an indicator of future levels of U.S. imports under the CBERA program. As a source of capital, FDI can play a key role in building additional capacity in recipient countries. Changes in FDI to sectors producing CBERA-exclusive products, such as textiles, are thus likely to result in future supply changes.

effects of their expiration. The HOPE and HELP Acts are set to expire on September 30, 2025. The expiration of the HOPE and HELP Acts is expected to significantly impact Haiti's apparel exports to the United States. Apparel imports from Haiti make up a large percentage of the imports under the CBERA program, but CBERA imports remain a small percentage of overall U.S. imports, so the impact on U.S. industries and consumers is likely to be minimal. See <u>table 3.5</u> and the accompanying discussion in the section "Effect on CBERA-Exclusive Products".

Investment information and data specific to CBERA products or industries are limited and often irregular in coverage. Data on macroeconomic conditions and forecasts, as well as on investment flows, were obtained from various sources published by international organizations, including the IMF. A country's GDP growth data were obtained from the IMF World Economic Outlook database. Global FDI stock in CBERA beneficiaries is reported by the United Nations Conference on Trade and Development. Written submissions to and testimony before the Commission have also served as additional sources of CBERA-specific information.

Impact of Macroeconomic Growth on Supply and Demand

GDP growth forecasts can provide insight into future trends in both U.S. demand and CBERA beneficiaries' supply capacity. Changes in the economic growth rate of the United States (the largest importer of CBERA beneficiaries' products) and the world will result in changes in the import demand for CBERA products, and growth in CBERA beneficiaries can affect their export supply levels. Table 3.9 summarizes the IMF's forecasted annual growth rates for real GDP in CBERA beneficiaries and the United States. These forecasts reflect the IMF's analysis of recent and future Caribbean growth drivers such as tourism, inflation, and oil prices, as described below.

Table 3.9 International Monetary Fund forecasts of real GDP growth in the CBERA countries and the United States, 2022–29

In annua	I percentage change.	CBERA = Caribbean Basin E	-conomic Recovery Act.

Source	2022	2023	2024	2025	2026	2027	2028	2029
Antigua and Barbuda	9.1	2.4	4.3	3.0	2.5	2.5	2.5	2.5
Aruba	8.5	4.3	6.5	2.2	2.6	2.5	1.6	1.3
Bahamas	10.8	2.6	2.0	1.8	1.7	1.6	1.6	1.5
Barbados	17.8	4.1	4.0	3.0	2.3	2.0	2.0	2.0
Belize	9.7	1.1	8.2	3.2	2.5	2.4	2.2	2.1
Dominica	5.6	4.7	4.6	4.2	3.3	2.9	2.7	2.4
Grenada	7.3	4.7	3.6	3.9	3.3	2.7	2.7	2.7
Guyana	63.3	33.8	43.6	10.3	23.0	21.0	13.3	11.8
Haiti	-1.7	-1.9	-4.2	-1.0	1.0	1.5	1.5	1.5
Jamaica	5.2	2.6	-0.8	2.1	1.6	1.6	1.6	1.6
Saint Kitts and Nevis	10.5	4.3	1.5	2.0	2.2	2.6	2.6	2.7
Saint Lucia	20.4	2.2	3.8	3.0	2.4	2.0	1.8	1.5
Saint Vincent and the Grenadines	5.0	5.8	4.8	4.7	2.9	2.7	2.7	2.7
Trinidad and Tobago	1.1	1.4	1.4	2.4	1.1	1.9	3.0	3.0
CBERA countries	9.5	5.5	7.4	3.5	6.4	6.8	5.3	5.1
United States	2.5	2.9	2.8	1.8	1.7	2.0	2.1	2.1
World	3.3	2.9	2.8	2.3	2.4	2.7	2.7	2.6

Source: IMF, "World Economic Outlook Database."

Note: The data shown for the years 2023–29 report projected GDP growth, except for Antigua and Barbuda, Grenada, St. Lucia, and St. Vincent, for which projections start in 2024, and Guyana, Haiti, and the United States, for which projections start in 2025. GDP growth of the CBERA region is calculated using GDP in constant prices in 2021 dollars of the 14 CBERA countries for which the IMF reported data.

On the import demand side, U.S. real GDP growth slightly increased from 2.5 percent in 2022 to 2.9 percent in 2023. U.S. real GDP grew only 2.8 percent in 2024. The IMF projects U.S. real GDP to continue growing from 2025 to 2029, albeit at lower rates than 2023 and 2024, as shown in <u>table 3.9</u>. As noted in chapter 2, U.S. imports under the CBERA program decreased from 2022 to 2024. Slower economic

growth in the coming years may reduce consumer demand, which may in turn continue to reduce CBERA imports.

On the export supply side, the IMF expects economic growth is expected to slow in the CBERA region following a strong rebound in 2022 and 2023 from effects after the onset of the COVID-19 pandemic in 2020. CBERA beneficiaries' economies grew 9.5 percent and 5.5 percent in 2022 and 2023, respectively. As shown in <u>table 3.9</u>, the IMF forecasts that CBERA countries will grow 3.5 percent in 2025 and maintain an average growth rate of 5.5 percent from 2025 to 2029. CBERA beneficiaries' projected growth is higher than that of the United States and the rest of the world, driven by fast-paced growth in Guyana (<u>table 3.9</u>). Aside from Guyana, growth is unlikely to significantly affect the CBERA beneficiaries' productive capacity and share of total U.S. imports.

In contrast with the aggregate growth across CBERA beneficiaries, Haiti has experienced economic contraction since 2022 (table 3.9). This contraction is largely due to its security crisis, which has disrupted supply chains and amplified inflationary pressures, and more recently the future uncertainty of the HOPE/HELP program. As discussed in chapter 2, a decrease in the supply of imports from Haiti to the United States coincided with this economic contraction. The IMF, which since 2022 has been facilitating Haiti's staff-monitored program directed toward economic growth in Haiti, has projected that Haiti will experience growth in 2026 and beyond as a result of the program's initial success. ¹⁹⁷

Overall, forecasted economic growth for CBERA beneficiaries will likely be underpinned by post-pandemic deceleration in the tourism sector and projected oil price decreases, as discussed below. Anticipated inflation stabilization and lower overall commodity prices driven by global factors could also impact growth for CBERA beneficiaries. ¹⁹⁸

As the COVID-19 pandemic waned, Caribbean economies experienced a strong rebound in tourism in 2022 and 2023. The World Travel and Tourism Council (WTTC) estimates that tourism in the Caribbean accounted for 11.4 percent of GDP in 2023, with revenue increasing by almost 15 percent over 2022. ¹⁹⁹ The Caribbean Tourism Organization (CTO) also reported that 2023 tourist visits to the Caribbean surpassed pre-pandemic levels by 0.8 percent. ²⁰⁰ Despite tourist arrivals' having reached pre-pandemic levels, tourism growth began to plateau into 2024. ²⁰¹ Although this does not directly affect CBERA exports, slow growth in the tourism sector may have spillover effects in the broader Caribbean economies, slowing overall economic growth and hindering productive capacity. In the coming years, CBERA countries where tourism makes up a majority of the economy will likely see slower economic growth relative to the CBERA region as a whole. For example, the IMF predicts growth in Aruba will average 2 percent between 2025 and 2029, compared to an average of 5.5 percent for countries in the CBERA region as a whole (table 3.9). ²⁰²

¹⁹⁷ IMF, *Haiti: Staff-Monitored Program*, January 6, 2025. The IMF forecast does not discuss the expiration of the HOPE and HELP Acts in September 2025 and how that might affect Haiti.

¹⁹⁸ IMF, "Regional Economic Outlook Western Hemisphere," October 2024, 9.

¹⁹⁹ WTTC, "Fact Sheet: Travel and Tourism: Economic Impact 2024," 2024. These estimates include countries and territories not in CBERA, such as Cuba and Puerto Rico.

²⁰⁰ CTO, "Caribbean Tourism Experiences Strong Growth in 2023," 2024.

²⁰¹ IMF, "Regional Economic Outlook Western Hemisphere," October 2024, 22.

²⁰² Ninety percent of Aruba's economy can be directly or indirectly linked to the tourism sector. USITC, hearing transcript, February 20, 2025, 34 (testimony of Zulema Erasmus, government of Aruba).

Lower oil prices could slow economic growth in the CBERA region's oil-exporting economies of Trinidad and Tobago and Guyana, despite the ongoing investment in Guyana's oil sector. The U.S. Energy Information Administration forecasts oil prices to average \$74 per barrel in 2025 and \$68 per barrel in 2026, a significant decrease from the 2024 price (\$81 per barrel). Barclays also forecasts that oil prices will reach an average of \$74 per barrel in 2025. Even though growth is expected to slow down, Guyana is still predicted to experience growth far above the CBERA average (table 3.9) as the oil industry continues to expand capacity, as discussed in chapter 2.

Economic growth in Trinidad and Tobago is projected to increase between 2025 and 2029, with a slight dip in 2026 (table 3.9). As mentioned in chapter 2, production of methanol and other energy products has been on the decline in recent years in Trinidad and Tobago, despite the country's being a major exporter. Assuming this trend continues—and oil prices decrease as mentioned in the previous paragraph—growth in the country's non-energy sectors is likely to be the driving force of economic growth.

Regardless of growth rates in the foreseeable future, CBERA exports are expected to continue accounting for only a small share of total U.S. imports. This is largely due to the relative sizes of the economies involved. The United States, as one of the world's largest importers, has a vast and diversified import base; however, the CBERA countries are relatively small economies with limited export capacity. Even with increased usage of trade preferences or sector-specific growth, their overall contribution to U.S. imports would likely remain modest. Slow tourism growth and lower oil prices suggest that CBERA beneficiaries will experience limited growth in their production capacity and supply.

Impact of Foreign Direct Investment on Supply

FDI has made a significant contribution in CBERA beneficiary countries, as a complement to domestic investment. Given their small economic size, FDI helps CBERA beneficiaries expand export activities, increase productivity, and increase employment. Limited information is available on CBERA-specific investment on an official or other consistent basis. Therefore, the following discussion relies largely on overall trends in FDI flows to CBERA beneficiaries.

As noted in the Commission's 2023 CBERA report, most new investment in CBERA countries continues to be in the services sector, which will not increase U.S. imports under CBERA because, as noted earlier, services are not covered under the CBERA program. FDI provides overall benefits to the economy, however, such as increased employment, technological innovation, and productivity, which boost economic growth in certain sectors that can spill over to other sectors.²⁰⁶ Overall economic growth in CBERA beneficiaries may stimulate future productive capacity for CBERA-eligible goods.

²⁰³ USEIA, "Short-Term Energy Outlook," March 2025, 2.

²⁰⁴ Reuters, "Barclays cuts 2025 Brent oil price forecast," March 14, 2025.

²⁰⁵ Given the substantial expected inflows from oil revenues and fiscal spending, close monitoring will be essential to prevent economic overheating and mitigate the adverse effects commonly associated with Dutch disease. IMF, *Guyana 2025 Article IV Consultation*, May 2025, 2.

²⁰⁶ Ali et al., "Does FDI Foster Technological Innovations? Empirical Evidence from BRICS Economies." *PLOS One* 18, no. 3 (March 9, 2023).

Since 2022, two known investment projects have supported CBERA-eligible goods. ²⁰⁷ In 2023, Chinesebased company Summit Luggage invested in Trinidad and Tobago to establish a manufacturing plant for hard shell luggage. Products manufactured in Trinidad and Tobago are intended for North American and European markets.²⁰⁸ As noted in the previous Commission report, Guyana received significant foreign investment in oil exploration and production between 2020 and 2021, namely from U.S.-owned ExxonMobil.²⁰⁹ ExxonMobil is continuing to invest in its Guyana operations and expand the country's oil capacity. In November 2024, ExxonMobil Guyana acquired the floating production storage and offloading (FPSO) vessel Prosperity from SBM Offshore for \$1.26 billion, among other investment projects.²¹⁰

The oil discovery in Guyana has also generated a significant amount of travel to the country, triggering new investments in the tourism sector, such as U.S. investments in luxury hotel projects. ²¹¹ Such investments will not directly impact Guyana's CBERA exports, but the oil sector may experience indirect benefits from economic growth that could foster continued expansion in the industry's production capacity.

Table 3.10 shows global annual FDI stock in CBERA beneficiaries during the 2020–23 period. Global FDI stock in CBERA beneficiaries totaled \$1.2 trillion in 2023, a 3 percent increase from 2022. Montserrat experienced the largest investment growth of 17 percent from 2022 to 2023; however, the country remains the smallest recipient of FDI in the CBERA region, receiving \$49 million in 2023. Both Antigua and Barbuda and Curacao experienced 14 percent growth in foreign investment. Trinidad and Tobago as well as Aruba experienced declines in investment of 7 percent and 4 percent, respectively.

²⁰⁷ Financial Times, "fDi Markets database," accessed July 8, 2025. [Add the search terms or name of dataset used.] ²⁰⁸ Government of Trinidad and Tobago, Ministry of Trade, Investment, and Tourism, InvesTT, "Summit (TT) Luggage - First Chinese Tenant to Move in at Phoenix Park," Trinidad and Tobago InvesTT, accessed July 8, 2025. ²⁰⁹ USITC, *CBERA 2023*, September 2023, 20.

²¹⁰ Guyana Business Journal, "ExxonMobil's FPSO Acquisition Strengthens Guyana's Oil Sector Position," November

²¹¹ Juan, "US Companies Invest US\$15B in Guyana over Four Years," Guyana Chronicle, December 25, 2024; USITC, hearing transcript, February 20, 2025, 45-46 (Ambassador Hinds, Embassy of the Republic of Guyana).

Table 3.10 Global foreign direct investment stock in CBERA countries In millions of dollars and percentage change. CAGR = compound annual growth rate.

					Percentage	CAGR
	2020	2021	2022	2023	change	2020-23
Source	(million \$)	(million \$)	(million \$)	(million \$)	2022–23 (%)	(%)
Antigua and Barbuda	1,467	1,776	2,090	2,390	14.4	17.7
Aruba	4,277	4,425	4,686	4,508	-3.8	1.8
Bahamas	26,073	27,258	28,512	29,904	4.9	4.7
Barbados	8,105	8,344	8,544	8,769	2.6	2.7
Belize	2,409	2,538	2,679	2,812	5.0	5.3
British Virgin Islands	950,876	990,238	1,028,356	1,068,246	3.9	4.0
Curacao	498	940	1,081	1,236	14.3	35.4
Dominica	483	512	517	537	3.9	3.6
Grenada	1,641	1,837	1,990	2,153	8.2	9.5
Guyana	8,197	12,666	17,074	10,279	-39.8	7.8
Haiti	1,940	1,992	2,031	2,063	1.6	2.1
Jamaica	17,693	18,013	18,332	18,763	2.4	2.0
Montserrat	36	38	42	49	16.7	10.8
Saint Kitts and Nevis	1,651	1,655	1,676	1,709	2.0	1.2
Saint Lucia	1,719	1,828	1,865	2,004	7.5	5.2
Saint Vincent and the Grenadines	1,365	1,527	1,601	1,683	5.1	7.2
Trinidad and Tobago	10,398	11,004	9,922	9,218	-7.1	-3.9
Total CBERA	1,038,828	1,086,591	1,130,998	1,166,323	3.1	3.9

Source: UNCTAD, "UNCTADstat," accessed April 29, 2025. Foreign direct investment: Inward stock.

Notes: The table shows an almost 40 percent decrease in Guyana's inward stock from 2022 to 2023. UNCTAD's Inward flow data for Guyana shows an increase of \$7,198 million in 2023 rather than the decline of \$6,795 million above. This discrepancy is contradictory and therefore does not contribute to our analysis of investment in Guyana. Foreign direct investment stock in the British Virgin Islands is largely due to its role as a Caribbean financial center. Government of the British Virgin Islands, "BVI Marks 40 Years of BVI Business Companies," January 30, 2025

Chapter 4 Impact of the CBERA Program on the Economies of the Beneficiary Countries

Congress enacted the Caribbean Basin Economic Recovery Act (CBERA) to support political and economic stability in the Caribbean Basin and to encourage economic growth and development. ²¹² This chapter covers the impact of the CBERA program on the economies of the beneficiary countries. The sections in this chapter contain a range of measures and analyses that show different aspects of program usage and effects. Export diversification, a key mechanism to foster economic growth and development, is evaluated in terms of the breadth (number of distinct goods exported), the depth ²¹³ (the lack of concentration of exports), and the level of research and development (R&D) intensity of exports. Program usage is analyzed through two measures: the utilization rate and the per capita value of eligible exports. The program utilization rate is a standard measure of the extent to which beneficiary exports take advantage of the CBERA program, and the per capita value of eligible exports is a complementary measure that captures changes in the amount of eligible exports a beneficiary country sends to the United States. Finally, the economic modeling described in chapter 3 is applied to evaluate the economic impacts of the CBERA program on top export goods.

Summary of Overall Impact

The extent of export diversification in CBERA beneficiaries varied during the period of 1990–2024. The breadth of export diversification in the CBERA region improved by 5 percent; the change for individual countries ranged from –58.2 percent to 151.9 percent in this period. The depth of export diversification in the CBERA region declined by 3.5 percent, driven by the increased concentration of exports in a few sectors. The CBERA region experienced an increase in the R&D intensity of exports, as the count of exported products in industries classified as high R&D intensity grew.

The impact of CBERA on program usage had mixed results. Per capita exports of eligible products increased on average, although the differences were stark across beneficiary countries. The overall utilization rate of CBERA preferences is low relative to other U.S. preference programs, although it varies substantially from country to country. Products with high values of trade, such as petroleum, have a large impact on the program utilization rate depending on the degree to which preferences are used for those products each year.

Modeling results indicate that 2024 beneficiary country revenues from exports are 27.9 percent higher than they would have been in the absence of the CBERA program. Although petroleum exports had high trade volumes under CBERA preferences, the program had little impact on their export values compared to goods with larger differences between duty-free and normal trade relations (NTR) duty rates. Among all beneficiary countries, the CBERA preferences program had the greatest economic impact on exports from Haiti.

²¹² CBEREA, Congressional Findings, Pub. L. No. 101-382, § 202, 104 Stat. 655 (1990). 19 U.S.C. § 2701 note (summarizing congressional findings and policy).

²¹³ Here, depth measures the level of diversification in a country's overall exports. A higher export depth indicates a more diversified export structure.

Export Diversification in CBERA Beneficiaries

Export diversification is often considered an engine of economic growth and a source of macroeconomic stability in low-income countries. ²¹⁴ This section analyzes the trends in export diversification by CBERA beneficiaries according to three different measures: breadth, depth, and R&D intensity. Each of these measures captures a unique characteristic of export diversification, and countries that increase by one measure may decrease by another. ²¹⁵ The use of these three measures provides a comprehensive and complementary examination of export diversification among CBERA beneficiaries. In addition, a long-term view (1990–2024) is essential because export diversification supports economic growth over the long term and initiatives to diversify exports usually require substantial investments that generate results over time. ²¹⁶

The data suggest that CBERA may have contributed to the change of the composition of exports for its beneficiaries (figure 4.1). From 1989 to 1999, agriculture and other mining and manufacturing dominated U.S. imports from CBERA countries, averaging 89 percent. However, their combined share declined to less than 20 percent between 2000 and 2024. In contrast, two sectors—methanol and energy products, and textiles and apparel—rose significantly, together accounting for 84.4 percent of total exports to the United States in 2023 and 83.5 percent in 2024. The share of methanol and energy products increased from an average of 10 percent in 1989–1999 to 54 percent in 2000–2024, driven by rising crude and refined petroleum exports. ²¹⁷ Textiles and apparel also expanded notably, growing from an average of 1.2 percent to 28 percent over the same periods. ²¹⁸ The growth of textiles and apparel in the CBERA region occurred mainly in Haiti and was also driven by the expansion of tariff preferences under the HOPE/HELP program. ²¹⁹ The addition of tariff preferences under HOPE I/HOPE II included more than 100 new apparel items ²²⁰ and enabled Haiti to diversify its exports by supplying more complex products, such as outerwear, performance and activewear, workwear, tailored items, and lingerie. ²²¹

²¹⁴ Lee and Zhang, "Export Diversification in Low-Income Countries," March 2022; Canh and Thanh, "The Dynamics of Export Diversification," August 2022; Sarin et al., "Export Diversification and Economic Growth," August 2022; Haddad et al., "Trade Openness Reduces Growth Volatility," May 2013; Zélity, "Export Diversification and Macroeconomic Shocks," April 2025.

²¹⁵ In the literature, the breadth of export diversification is usually called "the extensive margin of export diversification," and the depth of export diversification is usually called "the intensive margin of export diversification." IMF, "Sustaining Long-Run Growth and Macroeconomic Stability," July 3, 2014; Reis and Farole, *Trade Competitiveness Diagnostic Toolkit*, 2012; Giri et al., "Understanding Export Diversification," May 10, 2019. ²¹⁶ Haini et al., "Can Export Diversification Promote Export Upgrading?," January 2023; Lee and Zhang, "Export Diversification in Low-Income Countries," March 2022.

²¹⁷ Over this period both export volumes and export prices rose. See discussion in chapter 2, "Methanol and Energy Products."

²¹⁸ See the discussions in chapter 2 "Textiles and Apparel Products" and "Mining and Manufactured Products."

²¹⁹ USITC, U.S.-Haiti Trade, December 2022, 137.

²²⁰ USITC, U.S.-Haiti Trade, December 2022, 137.

²²¹ USITC, *U.S.-Haiti Trade*, December 2022, 21.

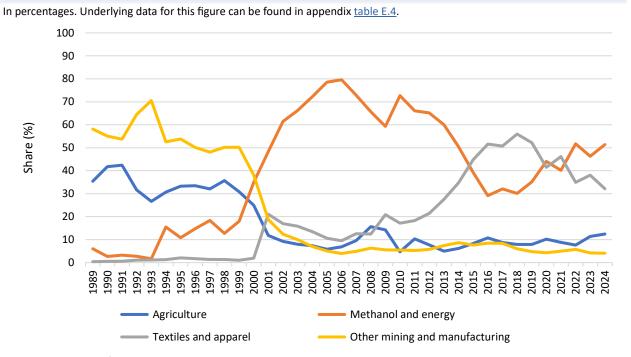


Figure 4.1 U.S. imports from CBERA beneficiaries, share of value, by major sector, 1989–2024

Source: USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025, accessed February 10, 2025.

Note: Agriculture products are imported under HS chapters 1–24; energy products are imported under HTS subheading 2905.11.20 (methanol) and under HS chapter 27 (other energy products); textile and apparel products are imported under HS chapters 50–63, 65; mining and manufactured products are products not included under other major product categories.

Breadth

The breadth of export diversification for each CBERA beneficiary is measured by the count of distinct *Harmonized Tariff Schedule of the United States* (HTS) 6-digit headings recorded in U.S. import data for each five-year span, beginning with 1990–94 and ending with 2020–24. ²²² An increase in the count of products imported from a CBERA beneficiary indicates greater diversification because it reflects the addition of new products into that beneficiary's export basket to the United States.

The overall number of products exported across CBERA beneficiaries to the United States increased by 5 percent between 1990 and 2024 (table 4.1). Most of this increase came from other mining and manufacturing and agriculture. Eleven of 17 current CBERA beneficiaries increased the number of products exported to the United States since 1990. Aruba, Guyana, Montserrat, Belize, and Trinidad and Tobago recorded the highest growth rates in product counts exported from 1990 to 2024. The increases

²²² IMF, "Sustaining Long-Run Growth and Macroeconomic Stability," July 3, 2014.

²²³ USITC DataWeb/Census, U.S. imports for consumption, accessed February 10, 2025. Sectors are organized as follows: Agriculture products are imported under HS chapters 1–24; energy products are imported under HTS subheading 2905.11.20 (methanol) and under HS chapter 27 (other energy products); textile and apparel products are imported under HS chapters 50–63, 65; mining and manufactured products are products not included under other major product categories.

for Aruba and Montserrat were mainly driven by other mining and manufacturing. ²²⁴ Belize and Guyana increased their exports across both other mining and manufacturing and agriculture products. The top five CBERA countries by export value to the United States also accounted for the highest number of distinct exported products, representing 60 percent of the total from the CBERA region. ²²⁵ In contrast, several countries experienced notable declines in product counts, including Dominica (–58.2 percent), Saint Lucia (–51.7 percent), and Barbados (–20.0 percent) from 1990 to 2024. Dominica's decline spanned all sectors, while Saint Lucia and Barbados saw decreases in product counts specifically in other mining and manufacturing and agriculture.

In comparison, the Pacific Island region saw a 98.1 percent increase in the count of products exported to the United States during the same period, although the CBERA region exported twice as many types of products as the Pacific Island region in 2024. ²²⁶ Pacific Island countries share several commonalities with CBERA beneficiaries: small economies with focus on services industries such as tourism²²⁷ and predominance of extractive industries that could be transformed and diversified. ²²⁸ They also have similar impediments to trade and investment: limited economies of scale, low economic diversification, limited institutional capacity, lack of infrastructure, and high compliance costs. ²²⁹

²²⁴ USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025. Sectors are organized as follows: Agriculture products are imported under HS chapters 1–24; energy products are imported under HTS subheading 2905.11.20 (methanol) and under HS chapter 27 (other energy products); textile and apparel products are imported under HS chapters 50–63, 65; other mining and manufactured products are products not included under other major product categories.

²²⁵ These countries are listed in <u>table 4.1</u> and include The Bahamas, Guyana, Haiti, Jamaica, and Trinidad and Tobago.

²²⁶ This statistic is calculated at the HTS 6-digit level. USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025; IMF, "Sustaining Long-Run Growth and Macroeconomic Stability," July 3, 2014. In 1990, the CBERA region exported three-and-a-half times as many types of products as the Pacific Island region.

²²⁷ USITC, U.S.-Pacific Islands Trade and Investment, September 2023, 248.

²²⁸ USITC, U.S.-Pacific Islands Trade and Investment, September 2023, 14.

²²⁹ USITC, U.S.-Pacific Islands Trade and Investment, September 2023, 16.

Table 4.1 Breadth of export diversification: number of distinct products exported to the United States In average count of products and percentages (%). — (em dash) = not applicable; n.c. = not calculable.

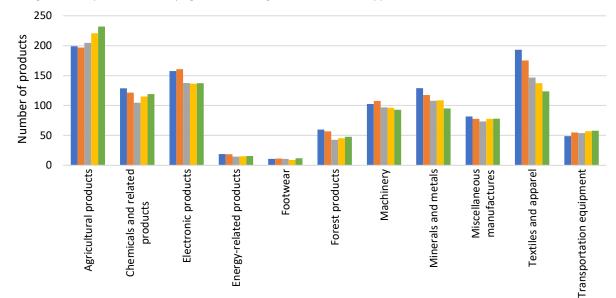
	·							Percentage change,
	1990–94	1995–99	2000-04	2005-09	2010–14	2015–19	2020–24	1990-2024
Country	(count)	(%)						
Aruba	26	55	63	64	67	64	65	151.9
Guyana	102	145	158	154	149	141	179	75.6
Montserrat	27	21	19	26	28	35	46	68.6
Belize	84	92	108	123	117	133	138	63.7
Trinidad and Tobago	223	302	332	362	305	311	312	39.9
Antigua and Barbuda	47	49	44	51	46	68	62	32.1
British Virgin Islands	36	79	92	87	88	88	47	31.7
Bahamas	125	158	178	215	198	185	162	30.0
Grenada	39	33	31	34	32	39	47	18.3
Saint Vincent and the								
Grenadines	41	50	39	28	30	44	44	8.3
Saint Kitts and Nevis	85	117	100	90	76	84	89	5.2
Haiti	281	269	245	203	229	248	243	-13.6
Jamaica	355	347	285	299	291	264	286	-19.5
Barbados	136	186	177	157	132	111	109	-20.0
Saint Lucia	98	117	100	80	60	52	47	-51.7
Dominica	93	114	70	40	37	40	39	-58.2
Curacao	_	_	_	_	90	100	81	n.c.
CBERA region	963	1,134	1,130	1,098	993	1,018	1,011	5.0
Pacific Islands								
region	270	337	433	495	467	503	534	98.1

Source: USITC calculations using data from USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025, accessed February

Note: The count of products exported is the average number of Harmonized Tariff Schedule of the United States 6-digit subheadings with U.S. imports in a given period. Higher counts indicate more export diversification. Curacao was designated a CBERA beneficiary effective January 1, 2014, and designated a Caribbean Basin Trade Partnership Act beneficiary on August 18, 2015.

The count of products exported to the United States by current CBERA beneficiaries also varied across sectors during 2000–24 (figure 4.2). Sectors with declining export values generally saw a reduced number of products, while those with growing export values experienced an increase in product counts. The count of products exported in the agricultural and transportation equipment sectors has grown consistently under the CBERA program for the past 24 years, with agricultural products up 16 percent and transport equipment up 18 percent. In contrast, the number of products in textiles and apparel declined by 36 percent, while minerals and metals fell by 26 percent.

Figure 4.2 Breadth of export diversification: five-year average number of *Harmonized Tariff Schedule of the United States* (HTS) 6-digit products grouped by sector, 2000–24



In average count of products. Underlying data for this figure can be found in appendix table E.5.

2005—2009

Source: USITC calculations using data from USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025.

Note: The count of products exported is the number of distinct *Harmonized Tariff Schedule of the United States* 6-digit subheadings with U.S. imports in a given year. Higher values indicate more export diversification.

2010—2014

2015-2019

R&D Intensity

■ 2000—2004

In addition to the number of products CBERA beneficiaries export by sector or country, this section shows the kinds of products that were added. One goal of CBERA beneficiaries is to diversify to nontraditional exports and reduce reliance on exports of raw materials. ²³⁰ This report uses the Organisation for Economic Co-operation and Development (OECD) R&D intensity taxonomy to further explore the changes in the export basket by the innovation or technological development of the industry. ²³¹

The OECD R&D intensity approach categorizes International Standard Industrial Classification of all economic activities (ISIC) Rev.3 industries into five groups—low, medium-low, medium, medium-high, and high intensity—using data on R&D expenditure and gross value added in each industry. The changes in the count of distinct *Harmonized Tariff Schedule of the United States* (HTS) 6-digit headings across the five categories of R&D intensity are a measure of the extent of export diversification in each

²³⁰ USITC, *CBERA 2023*, September 2023, 94; USITC, hearing transcript, February 20, 2025, 112 (testimony of Martin Cave, Antigua and Barbuda Chamber of Commerce).

²³¹ Galindo-Rueda and Verger, *OECD Taxonomy of Economic Activities Based on R&D Intensity*, July 16, 2016. ²³² Galindo-Rueda and Verger, *OECD Taxonomy of Economic Activities Based on R&D Intensity*, July 16, 2016, 10; World Integrated Trade Solution (WITS), "Product Concordance." To determine the R&D intensity level for each industry, we combine the OECD framework with the WITS HS to ISIC 3 concordance to map exported goods by industry.

industry. ²³³ Figure 4.3 shows that although the total number of products exported by the CBERA region has not substantially changed, there is a clear shift toward higher R&D intensity goods. Between 1990–94 and 2020–24, the number of goods exported in the upper R&D intensity segments—high, mediumhigh, and medium—increased from 569 to 935. Notably, the number of products in the high R&D intensity category alone more than doubled, rising from 105 to 221. ²³⁴ In contrast, the number of products in the low and medium-low R&D intensity groups declined from 999 to 870. The midpoint line in figure 4.3 shows that the share of low and medium-low R&D intensity goods declined from 64 percent of the total CBERA region's exports in 1990–94 to 48 percent in 2020–24, indicating an increase in export R&D intensity. ²³⁵

Changes in other mining and manufacturing exports product mix were the main driver of the improvement of R&D intensity in CBERA beneficiaries. ²³⁶ The shift to more medium-high and high R&D intensity industry exports took place in six CBERA countries: Antigua and Barbuda, Aruba, Belize, the British Virgin Islands, Dominica, and Monserrat.

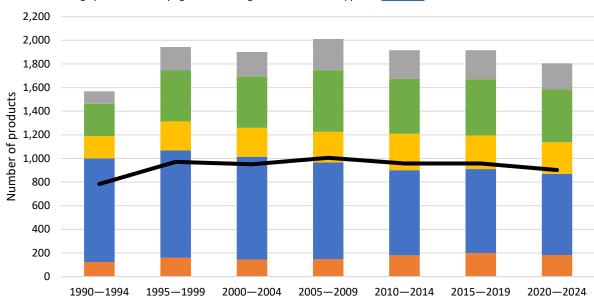
²³³ Galindo-Rueda and Verger, OECD Taxonomy of Economic Activities Based on R&D Intensity, July 16, 2016.

²³⁴ Most CBERA beneficiaries—including Aruba, Antigua and Barbuda, The Bahamas, Belize, Guyana, Jamaica, and Grenada—increased their R&D intensity in the other mining and manufacturing sector.

²³⁵ The midpoint in <u>figure 4.3</u> is a line that divides the total product count of each period in half. It indicates which technology intensity cluster is above or beyond the mean. By observing the position of various technology clusters compared to the midpoint, we can conclude whether the R&D intensity of CBERA beneficiaries' exports have improved from low and medium-low to upper categories (medium, medium-high, high).

²³⁶ USITC DataWeb/Census, U.S. imports for consumption, accessed February 10, 2025. Sectors are organized as follows: Agriculture products are imported under HS chapters 1–24; energy products are imported under HTS subheading 2905.11.20 (methanol) and under HS chapter 27 (other energy products); textile and apparel products are imported under HS chapters 50–63, 65; other mining and manufactured products are products not included under other major product categories. The R&D intensity level of individual goods is clustered into five groups: high, medium-high, medium, medium-low, and low. Galindo-Rueda and Verger, *OECD Taxonomy of Economic Activities Based on R&D Intensity*, July 16, 2016.

Figure 4.3 Five-year averages of number of *Harmonized Tariff Schedule of the United States* (HTS) 6-digit products the United States imported from current CBERA beneficiaries, by R&D intensity level, 1990–2024



In number of HTS 6-digit products. Underlying data for this figure can be found in appendix table E.6.

Medium-low

Source: USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025, accessed February 10, 2025.

Note: The data are converted into R&D intensity measures following Galindo-Rueda and Verger, OECD Taxonomy of Economic Activities Based on R&D Intensity, July 16, 2016. The midpoint line divides the total product count of each period in half. It indicates which technology intensity cluster is above or beyond the mean.

Medium-high

Medium

Depth

Another way to examine export diversification is to analyze the distribution of export revenues across products. A country that exports 10 products to the United States but derives 90 percent of export revenue from a single product is less diversified than one that exports the same number of products, each accounting for 10 percent of export revenue. ²³⁷ This report uses the "depth" of export diversification (inverse of export concentration) for a CBERA beneficiary to indicate that export value is more evenly distributed across products and the beneficiary is less dependent on a single product for much of its export revenue. It is measured with an index that takes values between zero and 1, with

²³⁷ The index of depth of export diversification is calculated as 1 minus the Herfindahl–Hirschman Index (HHI) and ranges from zero to 1. The HHI is calculated by squaring the share of each industry in the total exports of a CBERA beneficiary to the United States and then summing the resulting numbers. A higher depth index value (closer to 1) indicates a greater level of export diversification. The export categories are the HTS 6-digit subheadings with exports to the United States. See also discussion in the following studies: de la Cruz, "Export Diversification and the Caribbean Basin Economic Recovery Act," September 2008; IMF, "Sustaining Long-Run Growth and Macroeconomic Stability," July 3, 2014; Cadot et al., "Export Diversification," May 2011; USITC, *CBERA 2023*, September 2023.

higher values indicating a more balanced distribution of export revenue across products—reflecting improved export diversification.

Among CBERA beneficiaries, exports are concentrated in a few types of products.²³⁸ The majority of these exports are raw materials requiring minimal processing, including petroleum gases and oils and ores. <u>Table 4.2</u> shows the five largest CBERA beneficiary exporters and each country's top five export products to the United States during 2020–24.²³⁹ Some CBERA beneficiaries have diversified from supplying raw materials to producing downstream products, such as producing methanol from natural gas (Trinidad and Tobago) or aluminum oxide from aluminum ore (Jamaica).²⁴⁰

Table 4.2 Top five products imported by the United States from the five largest CBERA sources of U.S. imports, 2020–24

CBERA country	Top five products imported by the United States	Share of country's total U.S. imports (%)	Depth (1–HHI)
	Petroleum oils and products (2709.00, 2710.19, 2713.11,		
Guyana	2711.29), Aluminum ores (2606.00)	95.9	0.66
	Petroleum oils (2710.12), Rock lobster (0306.11), Polymers		
	of styrene (3903.11), Pebbles, gravel, broken or crushed		
Bahamas	stone (2517.10), Salt and sodium chloride (2501.00)	95.1	0.34
	Petroleum gases and oils (2711.11, 2709.00), Ferrous		
Trinidad and	products (7203.10), Anhydrous ammonia (2814.10),		
Tobago	Methanol (2905.11)	85.9	0.83
	T-shirts (6109.10, 6109.90), Sweaters, pullovers,		
	sweatshirts, waistcoats (6110.30, 6110.20), Men's or boy'		
Haiti	trousers (6203.43)	65.7	0.88
	Aluminum ores (2606.00), Aluminum oxide (2818.20),		
	Petroleum oils (2710.19), Yams (0714.30), Sauces and mixed		
Jamaica	condiments (2103.90)	51.1	0.92

 $Source: USITC\ DataWeb/Census, Imports\ for\ consumption,\ HTS\ chapters\ 1–97,\ accessed\ February\ 10,\ 2025.$

Note: CBERA countries' exports to the United States are shown as U.S. imports from those countries (i.e., mirror statistics). Product refers to an HTS 6-digit subheading. The percentages are calculated using exports of goods only.

The depth of export diversification of the CBERA region decreased slightly by 3.5 percent during 1990–2024 (table 4.3). Most CBERA beneficiaries experienced a concentration of their exports value on one or a few major products. This change was driven by a decrease in the share of agriculture and other mining and manufacturing industries from 2000 to 2024, alongside a rise in the share of products in methanol and energy and textile and apparel sectors.

Four countries—Montserrat, Trinidad and Tobago, The Bahamas, and Aruba—showed increased export diversification between 1990–94 and 2020–24. In 1990–94, Trinidad and Tobago's exports were heavily concentrated, with methanol and energy products accounting for 74 percent of exports under CBERA and other mining and manufacturing for 24 percent.²⁴¹ By 2020–24, its export structure became more

²³⁸ Table F.6 reports the top five products for all CBERA countries.

²³⁹ Table F.6 reports the top five products for all CBERA countries.

²⁴⁰ Government of Jamaica, written submission to the USITC, March 13, 2025, 1–6; Government of Trinidad and Tobago, written submission to the USITC, March 13, 2025, 3.

²⁴¹ USITC calculations using data from USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025.

balanced, with other mining and manufacturing rising to 44 percent and methanol and energy falling to 55 percent. The Bahamas decreased the share of other mining and manufacturing exports from 70 percent to 54 percent, while methanol and energy grew from 21 percent to 40 percent.

In contrast, 12 of the 17 CBERA beneficiaries experienced increasing export concentration. Between 1990–94 and 2020–24, Grenada's export composition shifted markedly—from a distribution across agriculture (28 percent), other mining and manufacturing (65 percent), and textiles and apparel (7 percent) to a heavy reliance on agriculture, which rose to 83 percent as other mining and manufacturing fell to 17 percent. Similarly, Antigua and Barbuda became more concentrated in other mining and manufacturing, with its share increasing from 63 percent to 93 percent over the same period.

Table 4.3 Depth of export diversification (1 – Herfindahl–Hirschman Index) by country, 1990–2024 In index. n.c. = not calculable; CBERA = Caribbean Basin Economic Recovery Act.

Country	1990–94	1995–99	2000-04	2005-09	2010-14	2015-19	2020-24
Jamaica	0.92	0.90	0.91	0.83	0.86	0.87	0.92
Saint Lucia	0.93	0.92	0.91	0.81	0.77	0.65	0.89
Montserrat	0.73	0.64	0.79	0.80	0.77	0.75	0.88
Belize	0.89	0.89	0.85	0.82	0.69	0.71	0.88
Haiti	0.98	0.92	0.86	0.78	0.79	0.85	0.88
Saint Kitts and Nevis	0.87	0.76	0.75	0.81	0.85	0.84	0.85
Barbados	0.91	0.88	0.90	0.84	0.83	0.82	0.84
Trinidad and Tobago	0.65	0.87	0.81	0.80	0.84	0.85	0.83
Dominica	0.89	0.86	0.82	0.83	0.80	0.84	0.81
Saint Vincent and the Grenadines	0.87	0.68	0.54	0.71	0.84	0.80	0.79
Curacao	n.c.	n.c.	n.c.	n.c.	n.c.	0.65	0.77
Grenada	0.84	0.71	0.74	0.65	0.59	0.70	0.70
Antigua and Barbuda	0.74	0.74	0.64	0.46	0.45	0.52	0.70
Bahamas	0.64	0.88	0.79	0.75	0.72	0.77	0.66
British Virgin Islands	0.70	0.79	0.81	0.72	0.66	0.57	0.63
Aruba	0.18	0.19	0.38	0.37	0.45	0.50	0.39
Guyana	0.66	0.85	0.81	0.74	0.45	0.66	0.34
CBERA region	0.88	0.91	0.88	0.87	0.89	0.93	0.85
Pacific Islands region	0.91	0.93	0.93	0.91	0.90	0.90	0.87

Source: USITC calculations using data from USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025, accessed February 10, 2025.

Note: The diversification index ranges from zero to 1. Higher values indicate more export diversification. Curacao was designated a CBERA beneficiary effective January 1, 2014, and designated a Caribbean Basin Trade Partnership Act beneficiary on August 18, 2015.

Comparison of Measures

Breadth and depth of export diversification are complementary measures, and countries may improve both or either. As noted above, breadth measures the count of distinct products exported and depth reflects the distribution of export revenues across all export products. Figure 4.4 groups CBERA beneficiary countries by change in their export breadth and depth from 1990–94 to 2020–24. It illustrates changes in export diversification along two dimensions: breadth (the number of exported products) and depth (the distribution of export revenues across products). During this period, four

²⁴² A country may increase export breadth by expanding its variety of product exports, and increase export depth by increasing variety in a balanced fashion that prevents it from becoming more dependent on one or a few products.

countries—Aruba, Montserrat, The Bahamas, and Trinidad and Tobago—improved on both fronts, expanding their product range while achieving a more balanced export structure. ²⁴³ Seven countries increased their export diversification in terms of breadth but decreased in terms of depth—Antigua and Barbuda, Belize, the British Virgin Islands, Grenada, Guyana, Saint Kitts and Nevis, and Saint Vincent—meaning the number of their export products increased but export revenue became more concentrated in one or a few products. ²⁴⁴ Five countries experienced a decline in both the breadth and depth of export diversification: Barbados, Dominica, Haiti, Jamaica, and Saint Lucia, indicating a narrowing and more concentrated export base. No CBERA countries experienced both a decrease in the breadth and increase in the depth of export diversification.

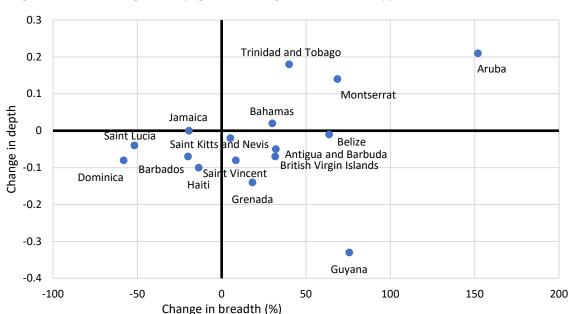


Figure 4.4 Changes in depth and breadth of exports, by country, 1990–2024

In percentages (%) and index change. Underlying data for this figure can be found in appendix table E.7.

Source: USITC calculations using data from USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025. Notes: Each dot represents a country. The change in depth is the difference between the concentration of export measure in 2024 and 1990 (from <u>table 4.3</u>). The change in breadth is the percentage change in the product count from 1990–94 to 2020–24 (from <u>table 4.2</u>). A positive value indicates an increase in export diversification in terms of the respective measure.

Determinants of Export Diversification in CBERA Beneficiaries

Government policies, cost of compliance, quality of infrastructure, and degree of trade liberalization are among the main factors influencing export diversification in middle- and low-income countries such as

²⁴³ For example, both The Bahamas and Trinidad and Tobago increased the count of products exported in other mining and manufacturing, while simultaneously reducing their overall reliance on methanol and energy products. The combined effect increased the depth of their diversification (see discussion above).

²⁴⁴ For example, Guyana significantly increased its product range but became more concentrated in export revenue, likely reflecting a growing reliance on oil (see <u>table 4.1</u>).

CBERA beneficiaries.²⁴⁵ The implementation of government policies that promote the development of new sectors is a strategy of Aruban authorities to improve export diversification. Zulema Erasmus, minister plenipotentiary and representative of the government of Aruba, highlighted the efforts of Aruba's government that focused on attracting and supporting local companies that would like to export niche products.²⁴⁶

The cost of compliance limits the ability of CBERA beneficiaries to improve their export diversification. An industry representative noted that "each category of goods requires specific inspection procedures to comply with the CBERA program, and these have been amended over the years, leading to a complex web of compliance procedures that have made it difficult to interpret and to remain current with the requirements . . . This therefore discourages some of our medium and small exporters, and limits their ability to diversify the goods they would like to send to the U.S." ²⁴⁷ The range of goods eligible under the CBERA program influences CBERA beneficiaries' export diversification. Hearing participants stated that expanding program eligibility to goods that are not currently covered under CBERA and suppressing some of the nontariff measures affecting exportation of these goods would create an opportunity for businesses to diversify their exports by adding new products. ²⁴⁸

Program Usage

CBERA program usage incorporates both the extent to which beneficiary countries take advantage of the available preferences and their ability to supply eligible products. These aspects of program usage are measured with the preference program utilization rate and the per capita value of eligible exports. Between 2020 and 2024, per capita exports of CBERA-eligible goods from the region increased from \$139 to \$352 reflecting more than 150 percent growth in the beneficiaries' export base of products eligible for CBERA program preference. However, during the same period, the region's average CBERA utilization rate declined sharply from 71.1 percent to 27.7 percent (table 4.4), indicating that countries did not make use of preferences for much of this expanded base. This divergence indicates that expanding trade in CBERA-eligible goods is not translating into proportional use of the CBERA program.

Utilization Rate

The preference program utilization rate measures the extent to which preferences are claimed by eligible imports.²⁴⁹ Specifically, the utilization rate is calculated by dividing the value of U.S. imports that claim preferences under that program (i.e., received duty elimination or reduction) by the value of

²⁴⁵ Handoyo et al., "Determinants of Export Diversification in Developing Countries," 2021; de la Cruz, "Export Diversification and the Caribbean Basin Economic Recovery Act," September 2008; Mohan, "Caribbean Diversification and Development," September 2016; Giri et al., "Understanding Export Diversification," May 10, 2019.

USITC, hearing transcript, February 20, 2025, 24–25 (testimony of Zulema Erasmus, government of Aruba).
 USITC, hearing transcript, February 20, 2025, 104, 106, 117 (testimony of Ann-Dawn Young Sang, AmCham Jamaica). For more information regarding cost of compliance and other factors that influence usage of CBERA, see section "Factors Influencing Program Usage."

²⁴⁸ USITC, hearing transcript, February 20, 2025, 19 (testimony of Neville Totaram, Department of Foreign Trade Ministry of Foreign Affairs and International Cooperation).

²⁴⁹ "The Utilization of Trade Preferences by COMESA Member States," 2023.

imports of all products that are covered by that program.²⁵⁰ The overall utilization rate for CBERA is calculated by summing U.S. imports from each country that claimed a CBERA program preference and dividing this by the sum of imports of CBERA-eligible products from those countries. The CBERA regional utilization rate refers to U.S. imports of CBERA program products from all CBERA beneficiaries that took advantage of preferential access. The CBERA regional utilization rate was 36.9 percent in 2023 and 27.7 percent in 2024 (table 4.4).

CBERA utilization rates vary over time and across countries. In 2024, five CBERA beneficiaries had utilization rates above 80 percent and seven had rates 2 percent or below. The Bahamas, Haiti and Grenada sustained utilization rates above 90 percent for 2020–24. Haiti primarily exports apparel, and duty-free access under HOPE and HELP is the primary competitive factor for these exports, given the relatively high NTR rate of duties on U.S. apparel imports. Grenada's largest CBERA program exports are fresh produce and spices. The primary CBERA export of The Bahamas is polystyrene (see chapter 2, "Manufactured Products"). In contrast, some smaller economies, including Saint Vincent and the Grenadines, Antigua and Barbuda, the British Virgin Islands, and Montserrat did not utilize the program at all for their eligible goods in 2024. Meanwhile, Aruba, Curacao, and Guyana claimed preferences on two percent or less of their eligible exports.

Table 4.4 CBERA utilization rates, by country, 2020–24
In percentages (%) and change in percentage points (ppts). CBERA = Caribbean Basin Economic Recovery Act.

Source	2020 (%)	2021 (%)	2022 (%)	2023 (%)	2024 (%)	2022-24 (ppts)
Bahamas	90.2	95.4	96.2	97.6	97.7	1.5
Grenada	94.5	91.6	97.9	98.7	95.3	-2.6
Haiti	92.7	93.5	94.9	94.8	94.1	-0.8
Jamaica	91.7	52.8	88.0	75.8	90.8	2.8
Saint Lucia	53.7	93.4	90.1	77.4	85.7	-4.4
Trinidad and Tobago	62.6	62.9	62.5	76.5	73.9	11.3
Saint Kitts and Nevis	49.6	80.8	85.2	88.8	68.3	-16.9
Belize	53.2	70.8	90.0	53.5	68.0	-22.0
Dominica	32.8	4.6	13.3	1.8	39.8	26.5
Barbados	74.4	59.9	17.0	50.8	26.1	9.1
Aruba	8.9	30.5	9.8	14.8	2.0	-7.8
Curacao	4.1	4.1	79.2	0.7	0.7	-78.5
Guyana	48.2	10.0	21.0	3.3	0.4	-20.6
Saint Vincent and the Grenadines	0.0	33.6	75.2	39.5	0.0	-75.2
Antigua and Barbuda	7.8	0.0	1.2	0.4	0.0	-1.2
British Virgin Islands	0.0	0.0	0.0	0.0	0.0	0.0
Montserrat	0.0	0.0	0.0	0.0	0.0	0.0
CBERA region	71.1	48.4	50.9	36.9	27.7	-23.3

 $Source: USITC\ DataWeb/Census,\ U.S.\ imports\ for\ consumption,\ accessed\ March\ 5,\ 2025.$

Note: The CBERA utilization rate is the value of all U.S. imports from a CBERA beneficiary country that claim the CBERA preferences divided by the value of all U.S. imports of CBERA-eligible products from that country.

²⁵⁰ See chapter 1 for a description of the country eligibility and product coverage of the original CBERA program, the CBTPA, the HOPE Acts, and the HELP Act.

²⁵¹ In 2024, Grenada's top exports under CBERA by value were frozen fruits (HTS subheading 0811.90.25, \$2.3 million) and fresh fruits (HTS subheading 0810.90.46, \$0.5 million).

Per Capita Value of Eligible Exports

The per capita value of eligible exports captures the magnitude of each country's exports of CBERA-eligible products, normalized by its population (table 4.5). At the country level, per capita export trends varied widely. In 2024, per capita exports ranged from less than a dollar (Saint Vincent and the Grenadines) to over 5,000 dollars (Guyana). Most countries saw a decrease in the measure between 2022 and 2024, but the average change for the region was positive due to a few countries that had large increases in the measure.

Table 4.5 Per capita U.S. import value of CBERA-eligible goods, based on CBERA country population, by source and by year, 2020–24

In dollars per person within the origin beneficiary country (\$) and percentage change.

						Percentage
Source	2020 (\$)	2021 (\$)	2022 (\$)	2023 (\$)	2024 (\$)	change 2022–24
Guyana	681.8	2,306.0	3,084.0	3,731.8	5,267.5	70.8
Trinidad and Tobago	677.3	876.7	1187.2	851.8	987.4	-16.8
Saint Kitts and Nevis	142.2	121.9	168.6	150.9	148.8	-11.7
Bahamas	159.0	189.1	210.1	150.0	141.3	-32.7
Montserrat	58.0	67.5	167.7	128.6	123.8	-26.2
Belize	74.2	56.6	57.8	66.8	114.5	97.9
Haiti	73.7	96.8	90.8	68.5	53.6	-41.0
Jamaica	42.0	81.8	53.6	65.8	50.8	-5.2
Curacao	24.5	16.8	136.5	52.5	36.1	-73.5
Grenada	22.6	24.7	34.7	28.4	25.5	-26.6
Barbados	36.1	4.6	13.2	5.5	6.1	-54.1
Aruba	3.3	6.5	3.3	4.0	4.9	46.5
British Virgin Islands	21.4	23.3	8.2	21.8	4.8	-41.1
Dominica	2.2	5.4	1.5	4.0	3.7	154.6
Saint Lucia	6.0	3.6	5.4	6.1	3.1	-42.6
Antigua Barbuda	5.0	3.4	6.1	30.9	2.6	-57.0
Saint Vincent and the Grenadines	0.9	0.7	1.7	1.0	0.7	-56.0
Total	139.5	246.3	296.9	286.3	352.1	18.6

Source: USITC DataWeb/Census, U.S. imports for consumption, accessed July 8, 2025.

As noted above, trends in eligible exports differed considerably from trends in utilization rates at the country level. Guyana accounted for the highest per capita value of CBERA-eligible exports, but its utilization rate fell dramatically from 48.2 percent in 2020 to 0.4 percent in 2024 (table 4.4). Trinidad and Tobago, with the second-largest eligible export base, demonstrated strong and improving CBERA utilization rates, contributing positively to overall program usage. Countries like Grenada, Haiti, Jamaica and Saint Lucia have relatively high utilization rates (above 85 percent) but relatively lower U.S. imports

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²⁵² Note the connection of this measure to the utilization rate. The utilization rate is derived from the total value of CBERA-eligible imports claimed divided by the total value of CBERA-eligible imports; the per capita usage rate is the total value of CBERA-eligible imports divided by the country's total population. The former measures what proportion of a beneficiary country's eligible imports claim benefits; the latter expresses, by beneficiary country, the maximum potential (as opposed to actual) U.S. imports per capita that could benefit from CBERA.

of eligible products given their size. In contrast, several countries experienced steep declines in utilization rates despite steady or rising eligible export values. Curacao, Saint Vincent and the Grenadines, and Belize each experienced significant drops in utilization rates between 2022 and 2024, contributing to the overall regional decline. Among countries with extremely low utilization rates, Saint Vincent and the Grenadines, Antigua and Barbuda, the British Virgin Islands, and Aruba also had per capita U.S. imports of CBERA-eligible goods below five dollars in 2024.

Factors Influencing Program Usage

Hearing participants, international organizations, and academic literature have noted several practical factors that may affect program usage. These factors include ability to meet U.S. import requirements, impermanence of CBTPA and Haiti HOPE/HELP, preference margins, mismatch between productive capacity and program eligibility, and other supply and demand factors affecting export activity. Some factors primarily impact one measure of program usage and others impact both (table 4.6). The sections below provide some examples of how these factors have impacted the two measures of program usage. ²⁵³

Table 4.6 Overview of factors influencing program usage

CBTPA=Caribbean Basin Trade Partnership Act; HOPE/HELP=Haitian Hemispheric Opportunity through Partnership Encouragement Act of 2006, Haitian Hemispheric Opportunity through Partnership Encouragement Act of 2008, Haiti Economic Lift Program Act of 2010.

	Per-capita value of	
Factor	eligible exports	Utilization rate
Ability to meet U.S. import requirements	Х	X
Impermanence of CBTPA and Haiti HOPE/HELP	X	Χ
Preference margin		X
Mismatch of productive capacity and program eligibility	X	
Supply and demand factors impacting export activity	X	

Source: Analysis by Commission staff based on hearing testimony, international organizations, and academic literature.

Ability to meet U.S. import requirements

Hearing participants cited two specific barriers to program usage: CBERA rules of origin and challenging U.S. nontariff measures not directly related to CBERA requirements. A representative from the American Apparel & Footwear Association (AAFA) commented on the "declining impact of CBERA due to its restrictive rules of origin" that, except for apparel imports from Haiti, generally require apparel to be made of U.S. (or regional) yarn and fabric to qualify for preferences. ²⁵⁴ The AAFA testimony noted that CBERA-qualifying apparel imports from Haiti fell sharply relative to apparel imported under other Haitian preference programs and that the use of CBERA by exporters is markedly lower than the use of Haiti-specific preference programs and the Dominican Republic-Central America-United States FTA by

²⁵³ Other factors like a country's import value, product import consistency, and familiarity with CBERA program were noted in the Commission's previous CBERA report and the Commission's report on the Pacific Islands to also impact program usage, but there was little evidence that these other factors were significant drivers of CBERA program usage over the time period of analysis for this report. USITC, *CBERA 2023*, September 2023, 87–88. USITC, *U.S.-Pacific Islands Trade and Investment*, September 2023, 120–124.

²⁵⁴ AAFA, prehearing brief to the USITC, March 13, 2025, 2.

exporters.²⁵⁵ AAFA's prehearing brief added that the exporters' difficulty with the CBERA rules of origin made CBERA "less effective at promoting employment" and Haitian exports than it otherwise could be.²⁵⁶ A representative for the American Chamber of Commerce Jamaica (AmCham Jamaica) stated that its members found the costs of compliance with the CBERA requirements to be prohibitive.²⁵⁷ These observations accord with the findings of Kniahin and de Melo (2022), in which the authors conclude that compliance costs of preferential trade agreements are associated with rules of origin requirements, which can be cumbersome, especially for small firms in developing countries.²⁵⁸ They further note that if rules of origin are not "sufficiently simple and transparent," their compliance costs (may) exceed their benefits."²⁵⁹

The range of CBERA-eligible products that countries can export is also influenced by their ability to meet export requirements and standards in the U.S. market. Many face challenges complying with sanitary and phytosanitary measures and maintaining the quality levels demanded by importers. For example, since 2016, the United States has banned catfish imports from Guyana due to food safety concerns, highlighting how such regulatory measures can limit a country's ability to benefit from trade preferences.²⁶⁰

The government of Saint Lucia noted that "serious concerns exist as to the negative consequence of nontariff measures on market access opportunities and export volumes." Saint Lucia stated that U.S. Food and Drug Administration regulations present "substantial hurdles for exporters" and noted that sanitary and phytosanitary measures, including expensive treatment protocols and testing requirements, affect local businesses' ability to capitalize upon CBERA's full benefits. ²⁶²

A Jamaican industry representative stated that the costs for companies to fly U.S. government officials to Jamaica to inspect products for export "result in these companies being unable to pay for the fees." Their testimony noted that, although large exporters are able to absorb the fees, small and medium-sized exporters are at a disadvantage.²⁶³

²⁵⁵ Most of this report uses the term "CBERA program" to collectively refer to the original act and the subsequent expansions (as described in chapter 1 of this report), but the testimony cited here references the individual components and observes the differences in usage of those components. All the associated programs are discussed in detail in chapter 1 of this report.

²⁵⁶ AAFA, prehearing brief to the USITC, March 13, 2025, 2.

²⁵⁷ USITC, hearing transcript, February 20, 2025, 104 (testimony of Ann-Dawn Young Sang, AmCham Jamaica).

²⁵⁸ Kniahin and de Melo, "A Primer on Rules of Origin as Non-Tariff Barriers," 2022.

²⁵⁹ Kniahin and de Melo, "A Primer on Rules of Origin as Non-Tariff Barriers," 2022.

²⁶⁰ USITC, hearing transcript, February 20, 2025, 19 (testimony of His Excellency Samuel A. Hinds, Embassy of the Republic of Guyana)

²⁶¹ Government of Saint Lucia, prehearing brief to the USITC, March 14, 2025, 2.

²⁶² Government of Saint Lucia, prehearing brief to the USITC, March 14, 2025, 2.

²⁶³ USITC, hearing transcript, February 20, 2025, 104 (testimony of Ann-Dawn Young Sang, AmCham Jamaica). Previous USITC CBERA Reports have noted that requirements for onsite inspections for agricultural products can be "particularly onerous." The USDA Animal and Plant Health Inspection Service (APHIS) conducts preclearance inspections for produce exports in some countries while USDA Food Safety and Inspection Service is responsible for other produces, including catfish. USITC, *CBERA 2023*, September 2023, 91.

Impermanence of the CBTPA and Haiti HOPE/HELP

Uncertainty about the renewal of the CBTPA and Haiti HOPE/HELP constitutes a key concern for the region. This uncertainty can reduce investment to produce and export CBERA-eligible products in beneficiary countries and also reduce orders by U.S. buyers. 264 It can also reduce preference usage for some products that may enter under other import programs, including duty drawbacks or foreign-trade zones. In renewing its request to make the CBTPA and HOPE/HELP permanent, the Caribbean Community (CARICOM) Secretariat noted that much of Trinidad and Tobago's and Guyana's petroleum and petroleum-based products enter the United States under the CBTPA.²⁶⁵ Furthermore, almost all Haiti's garment exports, some of which would face duties of over 30 percent without the preference programs, enter duty free under HOPE/HELP. The Secretariat noted that looming preference expiration creates uncertainty for businesses and investors who rely on the program to export.²⁶⁶ An industry representative noted that HOPE/HELP's "imminent expiration . . . on September 30, 2025 . . . is the greatest immediate threat." ²⁶⁷ The representative noted that the uncertainty of HOPE/HELP's renewal has "begun to dissuade retailers from placing their orders" with her company and that renewal of HOPE/HELP could increase interest from buyers in sourcing from Haiti. ²⁶⁸ The industry representative stated that the garment industry in Haiti, which employed 62,000 workers in 2021, has contracted to 22,000 workers.269

Preference margin

Studies have found that trade preference programs are more likely to be utilized for products with higher duty rates, as the greater duty savings justify the associated compliance costs. ²⁷⁰ Conversely, when NTR duty rates are low, the potential savings may not be sufficient to offset the administrative burden of claiming benefits under CBERA. ²⁷¹ For example, Haiti's utilization rate has been consistently high (table 4.4), in part because the apparel products that they export face high NTR duty rates. The low NTR duty rates for petroleum products and easier access to FTZs may also explain the lower utilization rates of CBERA program preferences for petroleum products by CBTPA beneficiaries such as Guyana. ²⁷²

²⁶⁴ See chapter 2 for examples in Haiti's textile and apparel industry.

²⁶⁵ CARICOM, written submission to the USITC, March 13, 2025, 10. Note that Guyana's utilization rate has fallen considerably since 2020 (table 4.4).

²⁶⁶ CARICOM, written submission to the USITC, March 13, 2025, 10.

²⁶⁷ USITC, hearing transcript, February 20, 2025, 61 (testimony of Gail Strickler, Brookfield Associates).

²⁶⁸ USITC, hearing transcript, February 20, 2025, 61 (testimony of Gail Strickler, Brookfield Associates).

²⁶⁹ USITC, hearing transcript, February 20, 2025, 61 (testimony of Gail Strickler, Brookfield Associates).

²⁷⁰ OECD, *Preferential Trading Arrangements*, March 18, 2005, 87; USITC, *African Growth and Opportunity Act*, March 2023, 68–70; WTO, "What Drives the Utilization of Trade Preferences?," July 10, 2025; Legge and Lukaszuk, "The Firm-Level Costs of Utilizing Free Trade Agreements," February 27, 2024, 1.

²⁷¹ OECD, Preferential Trading Arrangements, March 18, 2005, 87.

²⁷² See chapter 2 section Methanol and Energy Products. For more discussion, see USITC, *CBERA 2023*, September 2023, 90–91.

Mismatch between economies' productive capacity and CBERAeligibility

The size, diversity, quality of infrastructure, and capability of a country's productive sectors are critical in shaping the range and volume of CBERA-eligible goods it can supply. 273 Larger and more diversified economies, such as Jamaica, are better positioned to produce a wider array of goods—ranging from agricultural products to light manufactures—that fall within CBERA's coverage. This enhances their ability to benefit from the program. In contrast, smaller economies like Montserrat, Saint Kitts and Nevis, Barbados, or the British Virgin Islands have narrow productive bases, often centered on tourism or a limited set of goods, that may not align with CBERA-eligible product categories. Many Caribbean economies face high transportation costs, limited port efficiency (e.g., transit and port delays), and logistical barriers, which hinder their efforts towards export diversification and competitiveness. 274

Furthermore, the extent of the products eligible under the CBERA program influences CBERA beneficiaries' program usage. The expansion of the eligibility to products that are not currently part of the program would create opportunities for businesses to diversify their export. Special programs like HOPE/HELP grant Haiti more flexible and generous access to the U.S. market, in particular by relaxing rules of origin and expanding product coverage for apparel and textile goods, advantages not extended to other CBERA countries. Expanding goods eligibility in a similar manner could enhance the benefits of CBERA for other beneficiaries.

Supply and demand factors affecting export activity

Other broader supply and demand conditions also affect a country's export activity of eligible products. Supply shocks can disrupt or stimulate export activity. Haiti's export performance has been repeatedly disrupted by natural disasters, which have strained the country's already fragile production and trade infrastructure. In contrast, Guyana's discovery of offshore oil in 2015 has quickly transformed it into a major crude exporter, with the U.S. emerging as a key importer of its crude petroleum. Beyond natural and structural factors, shifts in global commodity prices and U.S. consumer and industrial demand also directly affect import levels. The expansion of domestic methanol production in the United States has reduced the significance of methanol exports from CBERA countries in the U.S. market.²⁷⁶

Impact on Total Exports and GDP

This section presents the results from using the model and simulation method discussed in chapter 3 to model the impact of CBERA on export revenues and gross domestic product (GDP) by country for the

²⁷³ Reis and Farole, "Trade Competitiveness Diagnostic Toolkit," 2012; Giri et al., "Understanding Export Diversification," 2019.

 ²⁷⁴ Government of Grenada, written submission to the USITC, March 14, 2025, 3; USITC, hearing transcript, February 20, 2025, 109–15 (testimony of Martin Cave, Antigua and Barbuda Chamber of Commerce).
 ²⁷⁵ USITC, hearing transcript, February 20, 2025, 17–24 (testimony of Neville Totaram, Guyana Department of Foreign Trade Ministry of Foreign Affairs and International Cooperation).

²⁷⁶ See chapter 2 section on Methanol.

top 20 most-imported products.²⁷⁷ Unlike models used by the Commission for previous CBERA reports, the model featured in this report analyzes CBERA imports separately for each CBERA-eligible country.²⁷⁸

Many products were exported to the United States under CBERA by a single country, with the exception of food manufactures (table 4.7). Furthermore, six out of nine countries that exported products to the United States under CBERA did so only for food manufacturing products. Because rules of origin are more flexible under the HOPE and HELP Acts than under other program preferences, Haiti was the sole country to export the top 11 apparel products to the United States under CBERA; these exports were estimated to be 148.9 percent higher as a result of CBERA. Trinidad and Tobago was the only country to export petroleum products to the United States under CBERA, but the estimated effect of CBERA was negligible.²⁷⁹ CBERA had a greater effect on chemical exports from that country, which increased by 8.4 percent, and food manufacturing exports, which increased by 31.2 percent. CBERA also boosted food manufacturing exports from Jamaica, estimated to be 17.9 percent higher as a result of CBERA.

Table 4.7 Estimated sector-level effects of the CBERA program on export revenues in CBERA beneficiary countries, 2024

In millions of dollars (\$) and percentages (%). CBERA = Caribbean Basin Economic Recovery Act; HTS = Harmonized Tariff Schedule of the United States; ** = value is less than \$50,000 in magnitude.

		Actual export	Change in export	Change in export
		revenues	revenues due to	revenues due to
Sector	CBERA beneficiary country	(million \$)	CBERA (million \$)	CBERA (%)
Apparel	Haiti	515.0	308.1	148.9
Chemicals	Bahamas	54.4	7.6	16.1
Chemicals	Trinidad and Tobago	179.1	13.9	8.4
Food manufacturing	Bahamas	**	**	12.4
Food manufacturing	Barbados	**	**	39.5
Food manufacturing	Belize	2.0	0.2	12.4
Food manufacturing	Grenada	**	**	19.9
Food manufacturing	Guyana	0.9	0.1	11.8
Food manufacturing	Haiti	1.6	0.1	4.9
Food manufacturing	Jamaica	44.5	6.8	17.9
Food manufacturing	Saint Lucia	0.5	0.1	16.4
Food manufacturing	Trinidad and Tobago	34.9	8.3	31.2
Petroleum	Trinidad and Tobago	763.7	2.9	0.4

Source: USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025, accessed March 19, 2025. Estimated effects are obtained from the USITC's modeling analysis.

Notes: Export revenues given in this table refer to total export revenues for each country across the products that compose each sector. CBERA export revenue from a given country is equivalent to the value of imports under CBERA preferences from that country; table 3.1 displays imports under CBERA for each product. Chemicals include HTS subheadings 2905.11.20 and 3903.11.00; food manufactures include HTS subheadings 2008.99.91, 2103.90.80, 2103.90.90, 2106.99.99, and 2202.10.00; and petroleum includes HTS subheadings 2709.00.10 and 2709.00.20.

Total export revenue from all 20 products across all CBERA beneficiaries increased by \$348 million as a result of CBERA access, an increase of 27.9 percent over estimated total export revenue in the absence

²⁷⁷ This analysis does not include a discussion of how CBERA affects domestic prices or production in CBERA beneficiary countries because domestic production data for those countries were unavailable.

²⁷⁸ USITC, CBERA 2023, September 2023, 70; USITC, CBERA 2021, September 2021, 46.

²⁷⁹ Although the United States imported about \$4 billion of petroleum from Guyana in 2024, Guyana did not claim any special preferences when exporting this petroleum. USITC DataWeb/Census, U.S. imports for consumption, accessed March 19, 2025.

of CBERA (table 4.8). Haiti was by far the country most affected by CBERA, with total export revenues higher by 147.8 percent, or \$308.1 million, as a result of CBERA preferences. Apparel exports to the United States are a large part of Haiti's economy and, as discussed earlier, a loss of access to HOPE and HELP preferences would have a detrimental impact on Haiti's apparel industry. 280 Although Trinidad and Tobago had the highest level of revenues from exporting to the United States, its change in export revenues as a result of CBERA was only 2.6 percent because a large fraction of its 2024 exports to the United States were of petroleum products, which faced a low NTR tariff rate and composed a low share of U.S. consumer expenditures on petroleum. 281

Finally, the Commission used GDP data from 2023 to estimate how an increase in exports caused by CBERA could affect the GDP of beneficiary countries. ²⁸² This calculation estimates only short-term changes in GDP from the increase in exports; the estimate does not consider longer-term changes in production or consumption that may arise because CBERA preferences exist. Counterfactual short-term GDP changes were less than 0.1 percent for all beneficiary countries other than Haiti, though Haiti's GDP increased by 1.6 percent over its counterfactual level without CBERA exports. Furthermore, the counterfactual modeling analysis considers only the 20 most-imported products across all CBERA-eligible countries and does not identify the most-imported products from each CBERA-eligible country. The estimated impact on GDP on exporters may therefore be an underestimate.

Table 4.8 Estimated total effect of the CBERA program on export revenues in the CBERA beneficiary countries, 2024

In millions of dollars (\$) and percentages (%). CBERA = Caribbean Basin Economic Recovery Act; ** = figure is less than \$50,000 in magnitude.

		Change in export	Change in export
	Actual export	revenues due to CBERA	revenues due to
Country	revenues (million \$)	(million \$)	CBERA (%)
Bahamas	54.4	7.6	16.1
Barbados	**	**	39.5
Belize	2.0	0.2	12.4
Grenada	**	**	19.9
Guyana	0.9	0.1	11.8
Haiti	516.6	308.1	147.8
Jamaica	44.5	6.8	17.9
Saint Lucia	0.5	0.1	16.4
Trinidad and Tobago	977.7	25.1	2.6
Total	1,596.6	348.0	27.9

Source: USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025. Estimated effects are obtained from the USITC's modeling analysis. See the model and data release for the data and model used to produce this table.

Note: Export revenues given in this table refer to total export revenues for each country across all 20 Harmonized Tariff Schedule of the United States 8-digit subheadings modeled in this chapter.

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²⁸⁰ USITC, hearing transcript, February 20, 2025, 53–57 (testimony of Wilhelm Lemke, ADIH).

²⁸¹ USITC DataWeb/Census, accessed March 5, 2025; USITC DataWeb/Census, HTS chapter 27, mineral fuels, accessed May 1, 2025.

²⁸² 2024 GDP data were not available for most CBERA beneficiary countries. World Bank, "GDP (Current U.S. Dollars)," accessed March 10, 2024.

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Appendix A *Federal Register* Notice

is made that one of FOIA's exemptions to disclosure applies. Such a determination will be made in accordance with the Department of the Interior's FOIA regulations and applicable law.

c. Section 304 of the NHPA (54 U.S.C. 307103(a))

After consultation with the Secretary, BOEM is required to withhold the location, character, or ownership of historic resources if it determines that disclosure may, among other things, risk harm to the historic resources or impede the use of a traditional religious site by practitioners. Tribal entities should designate information that falls under section 304 of the NHPA as confidential.

Request for Identification of Potential Alternatives, Information, and Analyses Relevant to the Proposed Action

BOEM requests data, comments, views, information, analysis, alternatives, or suggestions relevant to the proposed action from: the public; affected Federal, Tribal, State, and local governments, agencies, and offices; the scientific community; industry; or any other interested party. Specifically, BOEM requests information on the following topics:

- 1. Potential effects on biological resources, including bats, birds, coastal fauna, finfish, invertebrates, essential fish habitat, marine mammals, and sea turtles.
- 2. Potential effects on physical resources and conditions including air quality, water quality, wetlands, and other waters of the United States.
- 3. Potential effects on socioeconomic and cultural resources, including commercial fisheries and for-hire recreational fishing, demographics, employment, economics, environmental justice, land use and coastal infrastructure, navigation and vessel traffic, other uses (marine minerals, military use, aviation), recreation and tourism, and scenic and visual resources.
- 4. Other possible reasonable alternatives to the proposed action that BOEM should consider, including additional or alternative avoidance, minimization, and mitigation measures.
- 5. As part of its compliance with NHPA section 106 and its implementing regulations (36 CFR part 800), BOEM seeks comment and input from the public and consulting parties regarding the identification of historic properties within the proposed action's area of potential effects, the potential effects on those historic properties from the activities proposed in the COP, and any

information that supports identification of historic properties under NHPA. BOEM also solicits proposed measures to avoid, minimize, or mitigate any adverse effects on historic properties. BOEM will present available information regarding known historic properties during the public scoping period at https://www.boem.gov/renewable-energy/state-activities/vineyard-mid-atlantic-ocs-0544. BOEM's effects analysis for historic properties will be available for public and consulting party comment with the draft EIS

6. Information on other current or planned activities in, or in the vicinity of, the Project, their possible impacts on the Project, and the Project's possible impacts on those activities.

7. Other information relevant to the proposed action and its impacts on the human environment.

To promote informed decision-making, comments should be as specific as possible and should provide as much detail as necessary to meaningfully and fully inform BOEM of the commenter's position. Comments should explain why the issues raised are important to the consideration of potential environmental impacts and possible alternatives to the proposed action, as well as economic, employment, and other impacts affecting the quality of the human environment.

The draft EIS will include a summary of all alternatives, information, and analyses submitted during the scoping process for consideration by BOEM and the cooperating agencies.

Authority: 42 U.S.C. 4321 et seq., and

Authority: 42 U.S.C. 4321 et seq., and 40 CFR 1501.9.

Walter D. Cruickshank,

Deputy Director, Bureau of Ocean Energy Management.

[FR Doc. 2025–00733 Filed 1–14–25; 8:45 am] BILLING CODE 4340–98–P

INTERNATIONAL TRADE COMMISSION

[Investigation No. 332-606]

Caribbean Basin Economic Recovery Act: Impact on U.S. Industries and Consumers and on Beneficiary Countries

AGENCY: United States International Trade Commission.

ACTION: Notice of preparation of 2025 biennial report and scheduling of a public hearing.

SUMMARY: The Commission has begun preparation of its 2025 report, as required by section 215 of the Caribbean Basin Economic Recovery Act, and has scheduled a public hearing for February 20, 2025, in connection with the report. The report will cover trade during calendar years 2023 and 2024.

DATES: February 5, 2025: Deadline for filing

representative 5, 2025; Deadline for filling requests to appear at the public hearing. February 7: Deadline for filling prehearing briefs and statements.

February 12: Deadline for filing electronic copies of public hearing oral statements.

February 20: Public hearing. March 6: Deadline for filing posthearing briefs and statements.

March 13: Deadline for filing all other written submissions related to this investigation.

September 30: Deadline for transmittal of Commission report to Congress and the President.

ADDRESSES: All Commission offices, including the Commission's hearing rooms, are located in the U.S. International Trade Commission Building, 500 E Street SW, Washington, DC. All written submissions must be submitted electronically and addressed to the Secretary, U.S. International Trade Commission, 500 E Street SW, Washington, DC 20436. The Commission cannot accept paper copies at this time.

FOR FURTHER INFORMATION CONTACT:

Project Leader Alan Fox (202–205–3267 or alan.fox@usitc.gov) or Deputy Project Leader Chang Hong (202–205–2791 or chang.hong@usitc.gov) for information specific to this investigation. For information on the legal aspects of this investigation, contact Brian Allen (brian.allen@usitc.gov or 202–205–3034) or William Gearhart (202–205–3091 or william.gearhart@usitc.gov) of the Commission's Office of the General Counsel. The media should contact Claire Huber, Office of External Relations (202–205–1819 or claire.huber@usitc.gov).

The public record for this investigation may be viewed on the Commission's electronic docket (EDIS) at https://edis.usitc.gov. General information concerning the Commission may be obtained by accessing its internet address (https://www.usitc.gov). Hearing-impaired individuals are advised that information on this matter can be obtained by contacting the Commission's TDD terminal on 202–205–1810.

SUPPLEMENTARY INFORMATION:

Background: The report is required by section 215 of the Caribbean Economic Recovery Act (19 U.S.C. 2704). The Act requires the Commission to submit to Congress and the President biennial reports, by September 30 of each reporting year, regarding the economic impact of the Act on United States industries and consumers and on the economy of the beneficiary countries.

The Commission is required to provide an assessment of the effect, during the period covered by the report, on the United States economy generally as well as on those specific domestic industries which produce articles that are like, or directly competitive with, articles being imported into the United States from beneficiary countries; and the probable future effect the Act will have on the United States economy generally, as well as on such domestic industries.

Public hearing: A public hearing in connection with this investigation will be held in-person beginning at 9:30 a.m. on February 20, 2025, in the Main Hearing Room of the U.S. International Trade Commission, 500 E Street SW Washington, DC 20436. The hearing can also be accessed remotely using the WebEx videoconference platform. A link to the hearing will be posted on the Commission's website at https:// www.usitc.gov/calendarpad/ calendar.html.

Requests to appear at the hearing should be filed with the Secretary no later than 5:15 p.m., February 5, 2025, in accordance with the requirements in the "Written Submissions" section below. Any requests to appear as a witness via videoconference must be included with your request to appear. Requests to appear as a witness via videoconference must include a statement explaining why the witness cannot appear in person; the Chair, or other person designated to conduct the investigation, may at their discretion for good cause shown, grant such requests. Requests to appear as a witness via videoconference due to illness or a positive COVID-19 test result may be submitted by 3 p.m. the business day prior to the hearing.

All prehearing briefs and statements should be filed not later than 5:15 p.m., February 7, 2025. To facilitate the hearing, including the preparation of an accurate written transcript of the hearing, oral testimony to be presented at the hearing must be submitted to the Commission electronically no later than noon, February 12, 2025. All posthearing briefs and statements should be filed no later than 5:15 p.m., March 6, 2025. Posthearing briefs and statements should address matters raised at the hearing. For a description of the different types of written briefs and statements, see the "Definitions" section below.

In the event that, as of the close of business on February 5, 2025, no witnesses are scheduled to appear at the hearing, the hearing will be canceled. Any person interested in attending the hearing as an observer or nonparticipant should check the Commission website as indicated above for information concerning whether the hearing will be

Written submissions: In lieu of or in addition to participating in the hearing, interested persons are invited to file written submissions concerning this investigation. All written submissions should be addressed to the Secretary, and should be received no later than 5:15 p.m., March 13, 2025. All written submissions must conform to the provisions of section 201.8 of the Commission's Rules of Practice and Procedure (19 CFR 201.8), as temporarily amended by 85 FR 15798 (March 19, 2020). Under that rule waiver, the Office of the Secretary will accept only electronic filings at this time. Filings must be made through the Commission's Electronic Document Information System (EDIS, https:// edis.usitc.gov). No in-person, paperbased filings or paper copies of any electronic filings will be accepted until further notice. Persons with questions regarding electronic filing should contact the Office of the Secretary, Docket Services Division (202-205-1802), or consult the Commission's Handbook on Filing Procedures.

Definitions of types of documents that may be filed; Requirements: In addition to requests to appear at the hearing, this notice provides for the possible filing of four types of documents: prehearing briefs, hearing oral statements, posthearing briefs, and other written submissions.

(1) Prehearing briefs refers to written materials relevant to the investigation and submitted in advance of the hearing, and includes written views on matters that are the subject of the investigation, supporting materials, and any other written materials that you consider will help the Commission in understanding your views. You should file a prehearing brief particularly if you plan to testify at the hearing on behalf of an industry group, company, or other organization, and wish to provide detailed views or information that will support or supplement your testimony.

(2) Hearing oral statements (testimony) refers to the actual oral statement that you intend to present at the hearing. Do not include any confidential business information (CBI) in that statement. If you plan to testify, you must file a copy of your oral statement by the date specified in this

notice. This statement will allow Commissioners to understand your position in advance of the hearing and will also assist the court reporter in preparing an accurate transcript of the hearing (e.g., names spelled correctly)

(3) Posthearing briefs refers to submissions filed after the hearing by persons who appeared at the hearing. Such briefs: (a) should be limited to matters that arose during the hearing; (b)should respond to any Commissioner and staff questions addressed to you at the hearing; (c)should clarify, amplify, or correct any statements you made at the hearing; and (d) may, at your option, address or rebut statements made by other participants in the hearing.

(4) Other written submissions refers to any other written submissions that interested persons wish to make, regardless of whether they appeared at the hearing or filed a prehearing or posthearing brief, and may include new information or updates of information

previously provided.

In accordance with the provisions of section 201.8 of the Commission's Rules of Practice and Procedure (19 CFR 201.8), the document must identify on its cover (1) the investigation number and title and the type of document filed (i.e., prehearing brief, oral statement of (name), posthearing brief, or written submission), (2) the name and signature of the person filing it, (3)the name of the organization that the submission is filed on behalf of, and (4) whether it contains CBI. If it contains CBI, it must comply with the marking and other requirements set out below in this notice relating to CBI. Submitters of written documents (other than oral statements) are encouraged to include a short summary of their position or interest at the beginning of the document, and a table of contents when the document addresses multiple issues.

Confidential business information: Any submissions that contain CBI must also comply with the requirements and procedures of section 201.6 of the Commission's Rules of Practice and Procedure (19 CFR 201.6). Among other things, section 201.6 of the rules requires that the cover of the document and the individual pages be clearly marked as to whether they are the "confidential" or "nonconfidential" version, and that the CBI is clearly identified by means of brackets. All written submissions, except for CBI, will be made available for inspection by interested persons.

The Commission will not include any CBI in its report. However, all information, including CBI, submitted in this investigation may be disclosed to and used: (i) by the Commission, its

employees and Offices, and contract personnel (a) for developing or maintaining the records of this or a related proceeding, or (b) in internal investigations, audits, reviews, and evaluations relating to the programs, personnel, and operations of the Commission, including under 5 U.S.C. Appendix 3; or (ii) by U.S. government employees and contract personnel for cybersecurity purposes. The Commission will not otherwise disclose any CBI in a way that would reveal the operations of the firm supplying the information.

Summaries of views of interested persons: Interested persons wishing to have a summary of their views included in the report should include a summary with a written submission on or before March 13, 2025, and must use the Commission template, which can be downloaded from https:// www.usitc.gov/docket services/ documents/firm_or_organization_ summary word limit.pdf. The Commission template must be uploaded as a separate attachment with the written submission, which is filed on EDIS under the document type "Briefs and Written Submissions." The summary may not exceed 500 words and should not include any CBI. The summary will be published as provided only if it utilizes the Commissionprovided template, meets these requirements, and is germane to the subject matter of the investigation. The Commission will list the name of the organization furnishing the summary and will include a link where the written submission can be found.

By order of the Commission. Issued: January 8, 2025.

Susan Orndoff,

Supervisory Attorney, Docket Services Division.

[FR Doc. 2025–00677 Filed 1–14–25; 8:45 am]
BILLING CODE 7020–02–P

DEPARTMENT OF JUSTICE

Notice of Lodging of Proposed Modification to a Stipulated Order Under the Clean Water Act and Safe Drinking Water Act

On January 8, 2025, the Department of Justice lodged a proposed modification to Stipulated Order No. 1 that was entered in 2009 by the United States District Court for the Northern Mariana Islands in the lawsuit entitled *United States v. Commonwealth Utilities Corp. et al.*, Civil Action No. 08–cv–0051 (dkt. No. 14).

Stipulated Order No. 1 requires the Commonwealth Utilities Corporation (CUC) to undertake certain measures to address violations of the Clean Water Act (CWA), 33 U.S.C. 1311 et seq. and Safe Drinking Water Act (SDWA), 42 U.S.C. 300f. et seq. with respect to its wastewater treatment and drinking water systems. An EPA inspection in December of 2023 found deficiencies in CUC's operation and maintenance of its drinking water system. The proposed modification requires CUC to correct these deficiencies and undertake certain measures to ensure future compliance with the CWA and SDWA.

The publication of this notice opens a period for public comment on the proposed modification. Comments should be addressed to the Assistant Attorney General, Environment and Natural Resources Division, and should refer to *United States* v. *Commonwealth Utilities Corp.* D.J. Ref. No. 90–5–1–1–08471. All comments must be submitted no later than thirty (30) days after the publication date of this notice. Comments may be submitted either by email or by mail:

To submit comments:	Send them to:
By email	pubcomment-ees.enrd@ usdoj.gov.
By mail	Assistant Attorney General, U.S. DOJ—ENRD, P.O. Box 7611, Washington, DC 20044–7611.

Any comments submitted in writing may be filed in whole or in part on the public court docket without further notice to the commenter. During the public comment period, the Consent Decree may be examined and downloaded at this Justice Department website: https://www.justice.gov/enrd/consent-decrees. If you require assistance accessing Consent Decree, you may request assistance by email or by mail to the addresses provided above for submitting comments.

Scott Bauer,

Assistant Section Chief, Environmental Enforcement Section, Environment and Natural Resources Division.

[FR Doc. 2025–00686 Filed 1–14–25; 8:45 am] BILLING CODE 4410–15–P

DEPARTMENT OF LABOR

Employee Benefits Security Administration

[Prohibited Transaction Exemption 2025– 04; Exemption Application No. L-12069]

Exemption From Certain Prohibited Transaction Restrictions Involving Boilermakers Western States Apprenticeship Fund, Located in Page, Arizona

AGENCY: Employee Benefits Security Administration.

ACTION: Notice of exemption.

SUMMARY: This document gives notice of an individual exemption from certain prohibited transaction restrictions of the Employee Retirement Income Security Act of 1974 (ERISA). The exemption permits the purchase of a parcel of improved real property (the Property) by the Boilermakers Western States Apprenticeship Fund (the Plan or Applicant) from the "Navajo Nation" Lodge 4 of the International Brotherhood of Boilermakers, Iron Ship Builders, Blacksmith, Forgers, and Helpers (Lodge 4) whose members may be participants in the Plan.

DATES: Exemption Date: This exemption is in effect as of January 15, 2025. FOR FURTHER INFORMATION CONTACT: Mr.

Frank Gonzalez, Office of Exemption Determinations, Employee Benefits Security Administration, U.S. Department of Labor, (202) 693–8553. (This is not a toll-free number).

SUPPLEMENTARY INFORMATION: The Plan requested an exemption pursuant to ERISA section 408(a) and supplemented the request with certain additional information (that is collectively, referred to as the "Application").¹ On November 4, 2024, the Department of Labor (the Department) published a notice of proposed exemption in the Federal Register (the Proposed Exemption).²

Based on the Applicant's representations contained in the Application and the administrative record, the Department has determined to grant the Proposed Exemption. This exemption provides only the relief specified herein and does not provide relief from violations of any law other than the prohibited transaction provisions of ERISA.

Benefits of the Exemption: The Department is granting the exemption based in part on the Applicant's representations that, among other

¹ The procedures for requesting an exemption are set forth in 29 CFR part 2570, subpart B (76 FR 66637, 66644, October 27, 2011).

² 89 FR 87600.

Appendix B Technical Appendix to Chapter 3

Partial Equilibrium Model Specification

A constant elasticity of substitution (CES) framework is used to model the preferences of consumers in the U.S. economy. The model differentiates a given product by whether it is produced in the United States, imported by the United States under the CBERA preference program from an individual CBERA country, or is a non-CBERA import. Non-CBERA imports include imports both from countries not eligible for CBERA and from CBERA-eligible countries that do not claim CBERA preferences.

Products can come from any of 11 possible origins: domestic production within the United States, imports outside of CBERA preferences, and imports under CBERA preferences from 9 different CBERA-eligible countries. ²⁸³ Designating each origin by the index i, the model assumes a fixed number of homogeneous firms n_i in each origin that produces a unique variety of the differentiated product. U.S. consumers in the model have a love of variety, meaning that they prefer to consume many different varieties of a given product rather than a single variety. They can substitute in percentage terms between product varieties at a rate of σ , the key CES parameter in the model.

Optimal U.S. consumer demand for each differentiated product is given by:

$$q_i = E\beta_i \, p_i^{-\sigma} P^{\sigma - 1} \qquad (1)$$

$$P = \left(\sum_{i} n_{i} \beta_{i} p_{i}^{1-\sigma}\right)^{\frac{1}{1-\sigma}} \tag{2}$$

Here, q_i is the quantity demanded from a single firm producing in location i; p_i is the corresponding consumer price of the product; β_i is a parameter that captures shifts in consumer preferences across the different varieties; E is the level of aggregate expenditure for the entire product in the United States; and P is the product's CES price index. $q_{\text{U.S.}}$ therefore represents consumer demand for domestic production, and q_{Haiti} represents U.S. imports from Haiti or, alternatively, exports from Haiti to the United States.

As in Krugman (1979), the model assumes that each firm operates under monopolistic competition and has some market power for its produced variety. ²⁸⁴ In the equation below, pp_i represents the price a firm receives for its products sold to the U.S. market: ²⁸⁵

$$pp_i = \frac{p_i}{(1+t_i)}$$

Here t_i represents the respective tariffs the firms face, with $t_d=0$ for domestic firms supplying the U.S. market. Firms use labor as the only variable input for production. Let A_i represent the unit labor

²⁸³ A total of seventeen countries are eligible for CBERA preferences when exporting to the United States. However, eight of these seventeen countries either do not export products to the United States under the 20 HTS 8-digit subheadings featured in the model or do not claim CBERA preferences when exporting these products. USITC DataWeb/Census, accessed April 2, 2025.

²⁸⁴ Krugman, "Increasing Returns, Monopolistic Competition, and International Trade," 1979.

²⁸⁵ The model assumes a continuum of firms, so each firm prices as though it has no impact on the overall price index.

requirement of firms such that each firm's demand for variable labor as a function of quantity is given as:

$$L_i(q_i) = A_i q_i$$

Note that, with inverse productivity A_i fixed in the short run, the model predicts $\hat{L}_i = \hat{q}_i$, where \hat{L}_i and \hat{q}_i are the respective percentage changes in labor and quantity. Thus, demand for variable labor, such as production workers in the industry, moves in proportion to output in this framework.

Let w_i be the wages in source country i. Because demand is CES and labor is the only variable input in production, all firms will charge a constant markup over their marginal costs such that:

$$pp_i = \frac{\sigma}{\sigma - 1} A_i w_i$$

A firm's operating profits π_i are computed as revenues minus variable costs c_i . Operating profits are then proportional to a firm's revenue because:

$$\pi_i = pp_iq_i - c_iq_i = \frac{1}{\sigma}pp_iq_i$$

This equation is also used to model the operating profits from exporting in CBERA beneficiary countries. Chapter 4 discusses only the operating profits in those countries that come from exporting, because data on domestic production in CBERA beneficiary countries are not available.

Because the initial number of firms is assumed to be fixed in the short run, the model does not assume that operating profits are equal to zero. The model is solved using the equations in (1) and (2) and calibrating the initial number of firms and the preference parameters for each source with initial market shares. ²⁸⁶

It is important to note that this model is only able to provide the short-run effects on market participants from changes in tariffs. Furthermore, some positive effects may offset the negative consequences of CBERA preferences for U.S domestic shipments, including an increase in U.S. exports of intermediate goods to CBERA beneficiaries or an increase in domestic exports of final goods to third countries. With the exception of U.S. yarn and fabric production, the model does not calculate these effects or calculate the complex set of general equilibrium effects that may result when imports are granted duty-free treatment under CBERA preferences.

U.S. Production of Apparel Inputs

The United States exports domestically-produced yarn and fabric to Haiti, which is used as an input in the production of apparel that Haiti then exports back to the United States. ²⁸⁷ CBERA preferences therefore have an indirect effect on the U.S. yarn and fabric industry because a higher demand for Haiti's exports entails higher production of apparel inputs within the United States. The model assumes

²⁸⁶ Ahmad, "Conducting Profitability Analysis in Partial Equilibrium Models," July 2019, provides more details on how to calibrate the model with initial market shares.

²⁸⁷ The modeling assumes that apparel inputs include yarn and fabric. U.S. exports of cotton are not relevant to this exercise because Haiti does not have any significant spinning industry. USITC, *U.S.-Haiti Trade*, December 2022, 113.

that Haiti's apparel industry employs U.S. inputs in constant proportion to all other inputs that it uses in its production process. U.S. exports of yarn and fabric to Haiti are therefore proportionally related to U.S. demand for apparel from Haiti, so:

$$q_{\rm ai} = \mu q_{\rm Haiti}$$

where $q_{\rm ai}$ represents U.S. exports of apparel inputs, $q_{\rm Haiti}$ represents U.S. imports of apparel from Haiti, and μ is some constant fraction. Because exports of apparel inputs are a constant fraction of apparel imports, percentage changes in U.S. exports of apparel inputs would be equal to percentage changes of U.S. imports of apparel from Haiti. Furthermore, as with U.S. production of final goods discussed above, demand for labor in the production of U.S. apparel inputs is given by:

$$L_{\rm ai}(q_{\rm ai})=A_{\rm ai}\,q_{\rm ai}$$

and hence percentage changes in U.S. apparel production workers would equal percentage changes in U.S. production of apparel inputs.

Model Inputs

U.S. Production and Revenue Estimates

U.S. domestic production and revenue data are typically not reported at the *Harmonized Tariff Schedule* of the United States (HTS) 8-digit subheading level. The U.S. International Trade Commission estimated these revenues using available industry-specific data. For textile products, domestic revenue estimates rely on an industry assumption that imports supply 95 percent of the U.S. domestic market for apparel, leaving 5 percent for U.S.-produced items. Domestic production associated with each HTS subheading was calculated to align with this statistic. For other products, such as methanol and food manufactures, publicly available data from the U.S. Bureau of Labor Statistics (BLS) and the U.S. Census Bureau's (Census's) 2022 Economic Census were used.²⁸⁸ Methanol domestic revenue estimates were obtained using data from the *Chemical Economics Handbook* at S&P Global, and crude petroleum domestic revenue estimates were obtained using data from the U.S. Department of Energy.²⁸⁹

Other raw cane sugar (HTS subheading 1701.14.10), certain polyhydric alcohols (HTS subheading 1701.14.20), and fresh and chilled yams (HTS subheading 0714.30.10) were among the top 20 products most imported under CBERA, but they were not among the products modeled in chapters 3 and 4. CBERA program preferences are not likely to affect the total quantity of raw cane sugar imported under the WTO raw cane sugar tariff-rate quota (TRQ), and a change in the import source has no impact on the

²⁸⁸ BLS, "Quarterly Census of Employment and Wages," accessed April 9, 2025; Census, "Economic Census," 2022.

²⁸⁹ Bescond et al., *Methanol*, October 2024; EIA, "Crude Oil Production," accessed March 4, 2025.

U.S. domestic raw cane sugar industry. ²⁹⁰ This is because the in-quota quantities allocated to individual CBERA beneficiary countries do not affect the total quantity of raw cane sugar imported under the World Trade Organization (WTO) TRQ. The U.S. government typically reallocates TRQ quantities that suppliers in individual countries are unable to fill. Thus, HTS subheadings 1701.14.10 and 1701.14.20 were not modeled. The product category of fresh and chilled yams was also not modeled because it lacked any associated U.S. domestic industry. ²⁹¹

U.S. Production Worker Estimates

Information on the initial number of workers employed for the production of each product was obtained from the BLS's 2023 and 2024 Quarterly Census of Employment and Wages (QCEW). ²⁹² The QCEW has data on the number of production workers employed at the North American Industry Classification System (NAICS) 6-digit level. Assuming industries within a broader NAICS industry have the same value of marginal product for each additional production worker, the share of domestic exports of the HTS 8-digit subheading compared to total exports at the NAICS 6-digit level can be used to estimate the number of production workers for that industry:

$$\frac{\text{Production Workers in HTS 8-digit}}{\text{Production Workers in NAICS Industry}} = \frac{\text{Domestic Exports of HTS 8-digit}}{\text{Domestic Exports of NAICS Industry}}$$
(3)

This approach was used to obtain production worker estimates for all nonapparel subheadings. Because NAICS nomenclature changed between 2017 and 2022, using equation (3) to calculate production worker estimates for apparel subheadings resulted in estimates that fluctuated wildly and unrealistically from the 2022 values used in the CBERA 2023 report. ²⁹³ Estimates were therefore generated by adjusting 2022 production worker values according to changes in HTS-8 exports and changes in NAICS 6-digit production between 2022 and 2024. This process follows the equation:

$$\frac{\text{2024 Workers}}{\text{2022 Workers}} - 1 = \frac{1}{2} \left(\left(\frac{\text{2024 Exports}}{\text{2022 Exports}} - 1 \right) + \left(\frac{\text{2024 NAICS production}}{\text{2022 NAICS production}} - 1 \right) \right)$$

The above equation was used for all apparel HTS subheadings except women's and girls' shirts of manmade fibers and hats and headgear, which were not discussed in the 2023 CBERA report and

²⁹⁰ Raw cane sugar classified under HTS subheadings 1704.14.10 and 1704.14.20 is subject to a total quantity restriction set by the U.S. Secretary of Agriculture and allocated to individual countries by the Office of the U.S. Trade Representative. The total quantity of the WTO raw cane sugar TRQ is set to eliminate any impact on the U.S. domestic sugar industry, usually at the WTO-required minimum. Country allocations are based on historical sugar import quantities; sugar producers in the United States have their marketing allotments specified before the total import quantity is set and TRQs are allocated to TRQ countries. Without CBERA program preferences, import sourcing may shift under the TRQ, but the net effects on the domestic industry are likely to be zero. USTR, "Tariff Rate Quota Allocations for Raw Cane Sugar," July 18, 2023.

²⁹¹ USITC DataWeb/Census, accessed March 6, 2025. Although fresh and chilled yams are not modeled, the CBERA program preferences would lower prices, providing a benefit to U.S. consumers of this product.

²⁹² Previous CBERA modeling has used the Annual Survey of Manufactures (ASM). However, the most recent ASM data are from 2021. Census, "ASM (2018-2021)," 2021; BLS, "Quarterly Census of Employment and Wages," accessed April 9, 2025; USITC, *CBERA 2023*, September 2023, 147.

²⁹³ USITC, *CBERA 2023*, September 2023, 75.

therefore do not have a 2022 estimate for production workers.²⁹⁴ Production workers for these codes were estimated using equation (3).

The following tables report the data inputs used in modeling the effects of U.S. imports of CBERA-exclusive products (table B.1) and CBERA-nonexclusive products (table B.2).²⁹⁵

Table B.1 Model inputs for CBERA-exclusive products

In percentages (%), millions of dollars (\$), and number of workers. CBERA = Caribbean Basin Economic Recovery Act; HTS = Harmonized Tariff Schedule of the United States; n.e.s.o.i. = not elsewhere specified or included.

		Duty	CBERA	Non-CBERA	Domestic	Domestic
HTS		rate	imports	imports	revenue	production
subheading	Description	(%)	(million \$)	(million \$)	(million \$)	workers
6109.10.00	T-shirts of cotton	16.5	194.3	4,607.3	55.2	1,365
6109.90.10	T-shirts of manmade fibers	32.0	79.7	1,731.2	78.3	291
6110.30.30	Sweaters of manmade fibers, n.e.s.o.i.	32.0	53.4	4,514.9	162.5	1,112
	Trousers of cotton, sweaters of cotton,					
6110.20.20	n.e.s.o.i.	16.5	53.1	7,131.5	253.1	1,459
6203.43.90	Men's/boys' trousers (synth fibers)	27.9	38.5	1,651.7	85.2	783
	Men's/boys' shirts of manmade fibers,					
6205.30.20	n.e.s.o.i.	27.1	27.5	727.5	20.1	340
	Women's/girls' trousers (synth fibers,					
6104.63.20	not knitted), n.e.s.o.i.	28.2	21.9	1,677.8	82.7	208
6505.00.80	Hats and headgear	7.4	16.4	1,041.8	54.4	528
6204.63.90	Women's/girls' trousers, n.e.s.o.i.	28.6	11.9	1,071.0	55.4	125
6211.43.10	Women's/girls' track suits, n.e.s.o.i.	16.0	9.3	725.6	21.1	82
	Women's/girls' shirts of manmade					
6106.20.20	fibers, n.e.s.o.i.	32.0	8.8	730.9	25.7	580

Source: USITC DataWeb/Census, *Harmonized Tariff Schedule of the United States* (HTS), accessed March 5, 2025; USITC DataWeb/Census, accessed March 19, 2025; BLS, QCEW, "Employment and Wages Data Viewer," accessed March 30, 2025.

Note: The duty rate is the ad valorem equivalent from the *Harmonized Tariff Schedule of the United States* (HTS) for normal trade relations with partner countries.

²⁹⁴ USITC, *CBERA 2023*, September 2023, 69.

²⁹⁵ Tables B.1 through B.4 in the modeling appendix delineate information by CBERA-exclusive and CBERA-nonexclusive categories in order to match the labeling used in Chapter 3.

Table B.2 Model inputs for CBERA-nonexclusive products

In percentages (%), millions of dollars (\$), and number of workers. HTS = Harmonized Tariff Schedule of the United States; CBERA = Caribbean Basin Economic Recovery Act; n.e.s.o.i. = not elsewhere specified or included.

		Duty	CBERA	Non-CBERA	Domestic	Domestic
HTS		rate	imports	imports	revenue	production
subheading	Description	(%)	(million \$)	(million \$)	(million \$)	workers
2709.00.10	Petroleum oils, heavy	0.1	736.2	93,557.2	11,698	4,900
2905.11.20	Methanol	5.0	179.1	190.5	3,424	1,489
3903.11.00	Polystyrene	6.0	54.4	317.2	1,340	735
	Other food preps n.e.s.o.i., incl preps for the manufacture of beverages, non-dairy coffee whiteners, herbal teas					
2106.90.99	and flavored honey	6.0	36.5	6,297.9	16,289	42,504
2709.00.20	Petroleum oils, light	0.1	27.5	61,034.7	243,962	76,000
2103.90.90	Sauces and preparations, n.e.s.o.i.	6.0	24.4	1,485.0	13,012	19,291
2103.90.80	Mixed condiments and mixed seasonings	6.4	8.4	388.8	15,111	25,417
2202.10.00	Waters, containing added sugar or other sweetening	2.5	8.1	1,759.9	2,027	23,303
2008.99.91	Bean cake, bean stick, miso, other fruit, nuts	6.0	7.1	746.1	1,160	1,522

Source: USITC DataWeb/Census, Harmonized Tariff Schedule of the United States (HTS), accessed March 5, 2025; USITC DataWeb/Census, accessed March 19, 2025; BLS, QCEW, "Employment and Wages Data Viewer," accessed March 30, 2025; S&P Global, Chemical Economics Handbook, "Methanol," accessed March 4, 2025; EIA, "Crude Oil Production," accessed March 4, 2025; Census, "Economic Census," 2022, accessed March 4, 2025.

Elasticity of Substitution Estimates

The elasticity of substitution, σ , is a key model parameter that describes how consumption shifts across sources after a change in relative prices and can have a significant effect on model predictions. A higher value means that the products are more substitutable—or less differentiated—leading to larger estimated effects of tariff preferences on the domestic market.

The elasticities of substitution for the partial equilibrium analysis in chapter 3 were estimated using the approach introduced in Riker (2020).²⁹⁶ This approach determines elasticity values by regressing the customs value of U.S. imports on the ratio of the landed duty-paid value to the customs value, differentiating imports by country of origin and port of entry. Because the customs value is defined as the landed duty-paid value without insurance and freight costs or calculated duties, the ratio of the landed duty-paid value to the customs provides a measure of trade costs. The regression equation is given by:

$$\ln(\operatorname{Customs} \, \operatorname{Value}_{ij}) = \beta \ln \left(\frac{\operatorname{Landed} \, \operatorname{Duty} \, \operatorname{Paid} \, \operatorname{Value}_{ij}}{\operatorname{Customs} \, \operatorname{Value}_{ij}} \right) + \gamma_i + \gamma_j + \varepsilon_{ij}$$

where γ_i and γ_j are fixed effects for different countries of origin and ports of entry. The estimated elasticity of substitution σ is equal to $1-\beta$. Although HTS 8-digit subheadings represent products in the model, elasticities of substitution are estimated using data at the relevant HTS 4-digit level because regression estimates are more reliable than regression estimates made using 8-digit-level data. For

²⁹⁶ Riker, "A Trade Cost Approach to Estimating the Elasticity of Substitution," July 2020.

example, the elasticity for HTS subheading 6109.10.00, representing T-shirts of cotton, is estimated using data for category 6109.

<u>Table B.3</u> reports the substitution elasticity estimate for each of the CBERA-exclusive subheadings modeled, and <u>table B.4</u> reports the substitution elasticity estimate for each of the CBERA-nonexclusive subheadings modeled.

Table B.3 Estimates of elasticity of substitution, CBERA-exclusive products HTS = Harmonized Tariff Schedule of the United States; n.e.s.o.i. = not elsewhere specified or included.

HTS subheading	Description	Elasticity
6109.10.00	T-shirts of cotton	5.4
6109.90.10	T-shirts of manmade fibers	5.4
6110.30.30	Sweaters of manmade fibers, n.e.s.o.i.	8.3
6110.20.20	Trousers of cotton, sweaters of cotton, n.e.s.o.i.	8.3
6203.43.90	Men's/boys' trousers (synth fibers)	7.5
6205.30.20	Men's/boys' shirts of manmade fibers, n.e.s.o.i.	5.4
6104.63.20	Women's/girls' trousers (synth fibers, not knitted), n.e.s.o.i.	4.4
6505.00.80	Hats and headgear	4.2
6204.63.90	Women's/girls' trousers, n.e.s.o.i.	2.8
6211.43.10	Women's/girls' track suits, n.e.s.o.i.	3.6
6106.20.20	Women's/girls' shirts of manmade fibers, n.e.s.o.i.	4.7

Source: USITC estimates.

Table B.4 Estimates of elasticity of substitution, CBERA-nonexclusive products HTS = Harmonized Tariff Schedule of the United States; n.e.s.o.i. = not elsewhere specified or included.

HTS		Electicity
subheading	Description	Elasticity
2709.00.10	Petroleum oils, heavy	5.7
2905.11.20	Methanol	2.7
3903.11.00	Polystyrene	3.6
2106.90.99	Food preparations n.e.s.o.i., including preparations for the manufacture of	6.7
	beverages, non-dairy coffee whiteners, herbal teas and flavored honey	
2709.00.20	Petroleum oils, light	5.7
2103.90.90	Sauces and preparations n.e.s.o.i.	3.0
2103.90.80	Mixed condiments and mixed seasonings	3.0
2202.10.00	Waters, containing added sugar or other sweetening	2.8
2008.99.91	Bean cake, bean stick, miso, other fruit, nuts	4.1

Source: USITC estimates.

Apparel Input Estimates

To estimate the effect of CBERA preferences on the U.S. apparel input industry, the model requires two estimates, one of U.S. yarn and fabric exports to Haiti and the other of the number of U.S. workers needed to produce the apparel inputs that are then exported to Haiti. The data required to determine these measures come from the International Trade Administration's Office of Textiles and Apparel (OTEXA) and the QCEW.

Because a significant fraction of U.S. exports to Haiti are first rerouted through the Dominican Republic (DR), U.S. yarn and fabric exports to Haiti cannot simply be represented by their observed value in the

data. These exports are therefore instead calculated as the sum of U.S. yarn and fabric exports to Haiti and an estimation of U.S. yarn and fabric exports that arrive in Haiti through the Dominican Republic.

Total U.S. yarn and fabric to Haiti = Observed U.S. yarn and fabric to Haiti

+ Estimated U.S. yarn and fabric to DR

However, not all U.S. yarn and fabric exports to the Dominican Republic end up in Haiti. Some fraction of these exports are used as inputs in the Dominican Republic's own apparel industry, and some fraction are re-exported by the Dominican Republic to countries other than Haiti. The following expression provides an approximation of U.S. yarn and fabric exports that are transshipped through the Dominican Republic into Haiti.

U.S. yarn and fabric exports to DR
$$\times \frac{\text{DR yarn and fabric exports}}{\text{DR yarn and fabric exports} + \text{DR apparel exports}} \times \frac{\text{DR yarn and fabric exports to Haiti}}{\text{DR yarn and fabric exports}}$$

The second term accounts for yarn and fabric imports that the Dominican Republic uses in its own domestic apparel production rather than re-exporting, ²⁹⁷ and the third term accounts for yarn and fabric that the Dominican Republic re-exports to countries other than Haiti. Because OTEXA provides textile trade data for only the United States, data on exports from the Dominican Republic instead come from the United Nations' Comtrade database. ²⁹⁸

OTEXA data on U.S. yarn and fabric exports indicate that the United States exported \$11.0 million worth of yarn and fabric directly to Haiti in 2024, as well as a much larger \$488.0 million worth to the Dominican Republic. ²⁹⁹ Trade data from the UN Comtrade database suggest that around 27.4 percent of this \$488.0 million was re-exported rather than used in the Dominican Republic's domestic apparel industry and that approximately 86 percent of the Dominican Republic's yarn and fabric exports went to Haiti rather than other destinations. ³⁰⁰ The total measure of apparel inputs transshipped through the Dominican Republic is therefore \$488.0 × 0.274 × 0.86 = \$115.0, and combining this measure with the observed \$11.0 million that is directly exported to Haiti gives a total of \$126.0 million. This \$126.0 million represents the total estimated value apparel inputs exported to Haiti in 2024. It is divided by the total value of apparel exports to the United States to obtain the fraction μ .

²⁹⁷ This ratio uses the value of final apparel exports from the Dominican Republic, rather than the value of inputs used to produce this apparel, because the latter data were not available. This usage of final apparel export data may result in an underestimate of the U.S. yarn and fabric being re-exported by the Dominican Republic, but the amount of underestimation is likely small because the final approximated value still constitutes a high proportion of yarn and fabric exports from the Dominican Republic to Haiti. Data on the value of apparel that is both produced and consumed in the Dominican Republic were also not available, but this value is likely negligible because of the Dominican Republic's small population. UN, Trade Data, accessed March 11, 2025; USITC DataWeb/Census, U.S. imports for consumption, accessed March 5, 2025.

²⁹⁸ UN, Trade Data, accessed March 11, 2025.

²⁹⁹ USDOC, OTEXA, (aggregate 1, total apparel; aggregate 3, total yarn; and aggregate 4, total fabric), accessed March 10, 2025.

³⁰⁰ UN, Trade Data, accessed March 11, 2025.

The number of U.S. production workers employed in producing yarn and fabric exports to Haiti is estimated using a measure of output per worker, which is in turn calculated using production and employment data from the 2022 Economic Census.³⁰¹ Estimates of U.S. apparel input exports to Haiti are divided by this measure of output per worker to obtain estimates of the number of domestic workers involved in producing the yarn and fabric the United States exports on to Haiti. This process generates an estimate of 303 U.S. workers involved in the production of apparel inputs that are exported to Haiti.

³⁰¹ Census, "Economic Census," 2022.

Appendix C List of Witnesses Appearing at Hearing

Caribbean Basin Economic Recovery Act: 27th Report

CALENDAR OF PUBLIC HEARING

Those listed below appeared in the U.S. International Trade Commission's hearing:

Subject: Caribbean Basin Economic Recovery Act: Impact on U.S. Industries and

Consumers and on Beneficiary Countries, 27th Report

Inv. No.: 332-606

Date and Time: February 20, 2025 - 9:30 a.m.

Sessions were held in connection with this investigation in the Main Hearing Room (Room 101), 500 E St. SW, Washington, DC.

EMBASSY WITNESSES:

Embassy of Antigua and Barbuda Washington, DC

Sir Ronald Sanders, ambassador of Antigua and Barbuda to the United States of America

Embassy of Guyana Washington, DC

Samuel A. Hinds, ambassador of Guyana to the United States of America

Ambassador Neville Totaram (remote witness), director, Guyana Department of Foreign Trade, Ministry of Foreign Affairs and International Cooperation

Embassy of the Netherlands Washington, DC

The Honorable Zulema Erasmus, minister plenipotentiary for Aruba

ORGANIZATION AND WITNESSES:

Panel 1: Apparel and Footwear

American Apparel & Footwear Association (AAFA) Washington, DC

Beth Hughes, vice president, trade and customs policy

Association des Industries d'Haïti Petion-Ville, Haiti

> Wilhelm E. Lemke, Jr. (remote witness), immediate past president and executive board member

Brookfield Associates Washington, DC

Gail W. Strickler, vice president, Sae-A Trading

Gildan Activewear Montreal, Canada

Marc Doyon (remote witness), vice president, commodities

Panel 2: Chambers of Commerce and Processed Food Manufacturers

ORGANIZATION AND WITNESSES:

American Chamber of Commerce of Jamaica (AmCham Jamaica) Kingston, Jamaica

Ann-Dawn Young Sang (remote witness), president

Antigua and Barbuda Chamber of Commerce and Industry Limited St. John's, Antigua

Martin A. Cave (remote witness), executive director

Appendix D Summaries of Views of Interested Persons

Summaries of Views of Interested Persons

Interested persons had the opportunity to file written submissions with the U.S. International Trade Commission (USITC or Commission) in the course of this investigation and to provide a summary of their views as expressed in the submissions for inclusion in this report. This appendix contains these summaries, provided that they meet certain requirements set out in the notice of investigation (see appendix B). The Commission has not edited these summaries. This appendix also contains the names of other interested persons who filed written submissions during this investigation but did not provide summaries. A copy of each written submission is available in the Commission's Electronic Document Information System (EDIS, https://www.edis.usitc.gov) by searching for submissions related to Investigation No. 332-606.

Summaries Included with Written Submissions

United States Fashion Industry Association (USFIA)

Founded in 1989, the United States Fashion Industry Association (USFIA) represents U.S.-based apparel brands, retailers, importers, and wholesalers. Today, USFIA remains at the forefront of challenging tariff and non-tariff barriers that restrict free trade and hinder economic growth in the fashion sector. The global supply chain in fashion has grown increasingly intricate. For example, a bale of cotton grown in Texas might be spun into yarn in Europe, woven into fabric in Korea, and tailored into finished apparel in Vietnam before arriving at retail stores across the United States. These complex networks underscore international trade and illustrate the interdependence of domestic and global production systems. In 2024, U.S. imports of apparel, home textiles, and related products were approximately \$107.7 billion, marking a strong rebound from pandemic-era lows. USFIA member companies play a critical role by facilitating a network of global sourcing while supporting a wide range of high-paying jobs on American soil. These roles span fields—from design and product development to logistics and sourcing—and complement the broader international production network. This synergy between domestic employment and global trade exemplifies the interconnected nature of modern commerce and the value that the fashion industry contributes to the U.S. economy. However, the restrictive rules of origin under CBERA pose a significant challenge. The program mandates that qualifying apparel must be assembled in a beneficiary country using U.S. fabric from U.S. yarn, and it must be cut within the United States. If the fabric is cut abroad, the product must incorporate U.S. thread. Although an alternative provision exists for certain knit apparel produced in beneficiary countries from fabric made in the Caribbean Basin, these criteria are far less flexible compared to those under other trade preference programs such as DR-CAFTA or Haiti's HOPE Act. In practice, these stringent rules have rendered CBERA less attractive to manufacturers, as evidenced by the steady decline in CBERA-qualifying imports over recent years. In contrast, other regional preference programs have experienced robust growth, limiting CBERA's effectiveness in promoting domestic employment and U.S. exports. USFIA also welcomes the Commission's renewed study of Haiti's apparel preference program—a review that has not been conducted in over a decade. The comprehensive report released in September 2023 offers valuable insights into the economic impact on Haiti and highlights the evolving nature of its export mix. This renewed analysis enriches public understanding of U.S. trade preferences in the Caribbean and reinforces the critical need for more adaptable, modernized trade policies. CBERA serves as a lesson in how restrictive rules of origin can backfire, doing little to foster employment or promote U.S. exports.

None of the CBERA-eligible countries have managed to secure a significant share of the U.S. market, although several did have some production during the quota era. This sector remains an important opportunity to employ workers and develop manufacturing worldwide, and we encourage the Commission to analyze how CBERA could be improved.

Written Submissions Without Summaries

The following interested persons filed written submissions without summaries. Please see EDIS for full submissions.

Table D.1 List of interested persons that submitted written submissions without summaries

Name of Interested Person	
ACT The App Association	
American Apparel & Footwear Association	
American Chamber of Commerce of Jamaica	
Antigua and Barbuda Chamber of Commerce and Industry Limited	
Association des Industries d'Haïti	
Baron Foods	
Brookfield Associates	
Caribbean Community (CARICOM) Secretariat	
Embassy of Antigua and Barbuda	
Embassy of Grenada	
Embassy of Jamaica	
Embassy of the Netherlands	
Embassy of Saint Lucia	
Embassy of the Republic of Guyana	
Embassy of the Republic of Trinidad and Tobago	
Gildan Activewear	
Government of Belize	

Source: Compiled by USITC.

Appendix E Data Tables Corresponding to Figures in the Report

In compliance with Section 508, a 1998 amendment to the United States Rehabilitation Act of 1973, this report makes the content of its figures, graphs, and charts more accessible to people with disabilities. First, it provides alternative text where the figures appear; second, it provides this appendix to show all data used to construct the figures. As noted below each table, these tables correspond to figures in the executive summary, chapter 2, and chapter 4 of this report.

Table E.1 U.S. imports for consumption from CBERA beneficiary countries, by import program, 2024 In billions of dollars (\$) and percentages (%). — (em dash) = not applicable. This table corresponds to figure ES.1.

	Share of total			
	imports from	Value of imports under		
	CBERA	import program from CBERA		
Import program	beneficiaries (%)	beneficiaries (billion \$)	Avg. tariff (%)	Leading products
				Mineral fuels, inorganic
NTR duty free	37.7	4.4	0.0	chemicals
NTR dutiable	46.3	5.4	0.2	Mineral fuels
CBERA exclusive	5.1	0.6	0.0	Apparel
CBERA				Organic chemicals,
nonexclusive	10.7	1.2	0.0	mineral fuels, vegetables
GSP	0.1	0.02	0.0	Cane sugar
Total, all import				
programs	100.0	11.6	0.1	

Source: USITC DataWeb/Census, U.S. imports for consumption, accessed February 10, 2025.

Note: "NTR" refers to normal trade relations (this is the U.S. term; it has the same meaning as most-favored nation, or MFN). Imports entering the United States may enter either free of duty or subject to a rate of duty. Imports can also be subject to a quota or TRQ and could enter duty free if within the quota and subject to a duty if over the quota. "CBERA-exclusive" imports are imports of products eligible for preferential treatment only under CBERA. "CBERA-nonexclusive" imports are imports of products that entered the United States under CBERA but were also eligible for duty-free entry under the Generalized System of Preferences (GSP). "Avg. tariff" is the ad valorem equivalent tariff collected on entry—that is, the total of the duties collected, divided by the customs value of the imports.

Table E.2 U.S. imports under CBERA, by major product categories, 2020–24 In millions of dollars. This table corresponds to figure ES.2 and figure 2.1.

Sectors	2020	2021	2022	2023	2024
Agriculture	185	193	214	225	228
Methanol and Energy	796	879	1,449	914	943
Textiles and apparel	750	1,010	978	752	590
Other mining and manufacturing	77	109	160	83	75
All sectors	1,808	2,191	2,801	1,973	1,836

Source: USITC DataWeb/Census, U.S. imports for consumption, accessed February 10, 2025.

Note: Agriculture products are imported under HS chapters 1–24; energy products are imported under HTS subheading 2905.11.20 (methanol) and under HS chapter 27 (other energy products); textile and apparel products are imported under HS chapters 50 through 63; mining and manufactured products are products not included under other major product categories.

Table E.3 U.S. imports for consumption of energy products under CBERA, by product, 2020–24 In millions of dollars (\$). This table corresponds to figure 2.2.

Item	2020	2021	2022	2023	2024
Methanol	249	472	377	185	179
Energy products	547	407	1,072	729	764
Total	796	879	1,449	914	943

Source: USITC DataWeb/Census, U.S. imports for consumption, accessed February 10, 2025.

Note: Methanol refers to methanol (other than for use in producing synthetic natural gas or for direct use as a fuel) imported under Harmonized Tariff Schedule of the United States subheading 2905.11.20. Energy products refers to energy products imported under Harmonized Commodity Description and Coding System (HS) chapter 27 (mineral fuels).

Table E.4 U.S. imports from CBERA beneficiaries, share of value, by major sector, 1989–2024 In percentages (%). This table corresponds to figure 4.1.

			Other Mining and	Textiles and
Year	Agriculture (%)	Methanol and Energy (%)	Manufacturing (%)	apparel (%)
1989	35.4	6.0	58.1	0.4
1990	41.7	2.7	55.1	0.5
1991	42.4	3.2	53.8	0.6
1992	31.7	2.8	64.5	1.1
1993	26.7	1.7	70.5	1.1
1994	30.7	15.5	52.6	1.3
1995	33.3	10.8	53.8	2.0
1996	33.5	14.7	50.1	1.7
1997	32.1	18.4	48.1	1.4
1998	35.7	12.7	50.2	1.4
1999	30.8	18.0	50.2	1.0
2000	25.0	34.9	38.1	2.0
2001	11.8	48.3	18.8	21.0
2002	9.2	61.5	12.3	17.0
2003	8.0	66.2	10.0	15.8
2004	7.3	72.2	7.0	13.5
2005	5.8	78.6	5.0	10.6
2006	6.9	79.6	4.0	9.5
2007	9.6	72.9	4.9	12.6
2008	15.7	65.6	6.3	12.4
2009	14.2	59.3	5.6	20.9
2010	4.7	72.7	5.5	17.2
2011	10.4	66.0	5.3	18.3
2012	7.7	65.2	5.7	21.5
2013	5.0	60.0	7.4	27.5
2014	6.2	50.4	8.7	34.7
2015	8.3	39.2	7.7	44.8
2016	10.8	29.1	8.5	51.6
2017	8.7	32.1	8.4	50.8
2018	7.9	30.1	6.1	56.0
2019	7.9	35.1	4.8	52.2
2020	10.2	44.0	4.3	41.5
2021	8.8	40.1	5.0	46.1
2022	7.6	51.7	5.7	34.9
2023	11.4	46.3	4.2	38.1
2024	12.4	51.4	4.1	32.1

Note: Agriculture products are imported under HS chapters 1 through 24; energy products are imported under HTS subheading 2905.11.20 (methanol) and under HS chapter 27 (other energy products); textile and apparel products are imported under HS chapters 50-63, 65; mining and manufactured products are products not included under other major product categories.

Table E.5 Breadth of export diversification

In average count of products. This table corresponds to figure 4.2.

Sector	2000-2004	2005-2009	2010-2014	2015-2019	2020-2024
Agricultural products	199	197	205	221	232
Chemicals and related products	129	122	105	115	119
Electronic products	158	161	138	137	137
Energy-related products	19	19	15	15	16
Footwear	11	11	11	9	12
Forest products	60	57	43	45	48
Machinery	103	108	97	96	93
Minerals and metals	129	117	108	109	95
Miscellaneous manufactures	82	78	73	78	78
Textiles and apparel	193	175	147	137	124
Transportation equipment	49	55	54	57	58
All sectors	1,135	1,105	999	1,025	1,017

Source: USITC calculations using data from USITC DataWeb/Census, U.S. imports for consumption, accessed February 10, 2025. Note: The count of products exported is the number of distinct HTS 6-digit subheadings with U.S. imports in a given year. Higher values indicate more export diversification.

Table E.6 Five-year average number of U.S. import products from CBERA beneficiaries, by R&D intensity level, 1990–2024

In number of products. This table corresponds to figure 4.3.

R&D intensity	1990–1994	1995–1999	2000-2004	2005-2009	2010-2014	2015-2019	2020-2024
Low	123	160	144	148	180	199	183
Medium-low	876	907	870	818	721	711	687
Medium	191	247	245	259	308	285	267
Medium-high	273	431	437	522	465	476	447
High	105	198	206	264	242	245	221
Total	1,568	1,943	1,902	2,011	1,916	1,916	1,805
Mid-point	784	972	951	1,006	958	958	903

Source: USITC DataWeb/Census, U.S. imports for consumption, accessed February 10, 2025.

Note: The data are converted into R&D intensity measures following Galindo-Rueda, Fernando, and F. Verger., OECD Taxonomy of Economic Activities Based on R&D Intensity, 2016.

Table E.7 Changes in depth and breadth of exports, by country, 1990–2024 In percentages (%) and change in percentage points (ppts). This table corresponds to figure 4.4.

Country	Change in breadth,	Change in depth,
Country	1990–2024 (%)	1990–2024 (ppts)
Aruba	151.9	0.2
Guyana	75.6	-0.3
Montserrat	68.6	0.1
Belize	63.7	0.0
Trinidad and Tobago	39.9	0.2
Antigua and Barbuda	32.1	-0.1
British Virgin Islands	31.7	-0.1
Bahamas	30.0	0.0
Grenada	18.3	-0.1
Saint Vincent	8.3	-0.1
Saint Kitts and Nevis	5.2	0.0
Haiti	-13.6	-0.1
Jamaica	-19.5	0.0
Barbados	-20.0	-0.1
Saint Lucia	-51.7	0.0
Dominica	-58.2	-0.1

Source: USITC calculations using data from USITC DataWeb/Census, U.S. imports for consumption, accessed April 10, 2025, accessed February 10, 2025.

Notes: The change in depth is the difference between the concentration of export measure in 2024 and 1990 (from table 4.3). The change in breadth is the percentage change in the products count from 1990 to 2024 (from table 4.2). A positive value indicates an increase in export diversification in terms of the respective measure.

Appendix F Additional Data

Table F.1 U.S. imports for consumption from CBERA countries, by source and by year, 2020–24 In millions of dollars.

Source	2020	2021	2022	2023	2024
Antigua Barbuda	5	29	9	12	22
Aruba	34	27	16	15	11
Bahamas	270	446	1,721	1,822	1,790
Barbados	46	43	51	45	48
Belize	51	67	61	55	81
British Virgin Islands	8	5	4	21	89
Curacao	27	40	48	70	32
Dominica	2	3	2	2	2
Grenada	12	15	17	15	14
Guyana	735	2,168	2,842	3,400	5,221
Haiti	829	1,101	1,044	798	631
Jamaica	383	505	348	388	360
Montserrat	2	1	2	1	5
Saint Kitts and Nevis	50	40	31	22	20
Saint Lucia	8	10	11	10	7
Saint Vincent and the Grenadines	6	5	9	5	8
Trinidad and Tobago	2,621	4,170	5,426	3,011	3,246
Total	5,089	8,682	11,640	9,691	11,585

Table F.2 U.S. imports for consumption under CBERA preference, by source and by year, 2020–24 In millions of dollars. ** = rounds to zero.

Source	2020	2021	2022	2023	2024
Antigua Barbuda	**	0	**	**	0
Aruba	**	**	**	**	**
Bahamas	57	71	80	58	55
Barbados	8	1	1	1	**
Belize	15	16	21	15	32
British Virgin Islands	0	0	0	0	0
Curacao	**	**	16	**	**
Dominica	**	**	**	**	**
Grenada	2	3	4	3	3
Guyana	265	188	532	100	17
Haiti	768	1,030	991	756	593
Jamaica	109	123	134	142	131
Saint Kitts and Nevis	3	5	7	6	5
Saint Lucia	1	1	1	1	**
Saint Vincent and the Grenadines	0	**	**	**	0
Trinidad and Tobago	579	754	1,014	891	998
Total	1,808	2,191	2,801	1,973	1,836

Table F.3 Leading U.S. imports for consumption under CBERA, by HTS chapter and by year, 2020–24 In millions of dollars. — (em dash) = not applicable.

HTS chapter	Description	2020	2021	2022	2023	2024
	Mineral fuels, mineral oils and products of their					
27	distillation; bituminous substances; mineral waxes	547	407	1,072	729	764
	Articles of apparel and clothing accessories, knitted or					
61	crocheted	608	806	796	576	442
29	Organic chemicals	257	492	436	190	183
	Articles of apparel and clothing accessories, not knitted					
62	or crocheted	114	170	155	150	123
21	Miscellaneous edible preparations	54	60	61	73	74
39	Plastics and articles thereof	60	80	90	67	64
17	Sugars and sugar confectionery	24	16	41	37	49
07	Edible vegetables and certain roots and tubers	33	34	34	45	45
	Preparations of vegetables, fruit, nuts or other parts of					
20	plants	26	27	29	30	22
65	Headgear and parts thereof	10	17	13	15	18
22	Beverages, spirits, and vinegar	11	15	14	13	14
All other products	_	64	66	60	48	39
Total, all products	_	1,808	2,191	2,801	1,973	1,836

Table F.4 Shares of Leading U.S. imports for consumption under CBERA, by HTS chapter and by year, 2020-24

In percentages of total. — (em dash) = not applicable; ** = rounds to zero.

HTS chapter	Description	2020	2021	2022	2023	2024
	Mineral fuels, mineral oils and products of their					
27	distillation; bituminous substances; mineral waxes	30.3	18.6	38.3	36.9	41.6
	Articles of apparel and clothing accessories,					
61	knitted or crocheted	33.6	36.8	28.4	29.2	24.1
29	Organic chemicals	14.2	22.5	15.6	9.6	10.0
	Articles of apparel and clothing accessories, not					
62	knitted or crocheted	6.3	7.7	5.5	7.6	6.7
21	Miscellaneous edible preparations	3.0	2.7	2.2	3.7	4.0
39	Plastics and articles thereof	3.3	3.6	3.2	3.4	3.5
17	Sugars and sugar confectionery	1.4	0.7	1.5	1.9	2.7
07	Edible vegetables and certain roots and tubers	1.8	1.6	1.2	2.3	2.5
	Preparations of vegetables, fruit, nuts or other					
20	parts of plants	1.4	1.3	1.0	1.5	1.2
65	Headgear and parts thereof	0.6	0.8	**	0.7	1.0
22	Beverages, spirits, and vinegar	0.6	0.7	0.5	0.6	0.8
All other products	_	3.6	3.0	2.1	2.4	2.1
Total, all products	_	100.0	100.0	100.0	100.0	100.0

Table F.5 Leading U.S. imports for consumption under CBERA, by HTS number and by year, 2020–24 In millions of dollars. — (em dash) = not applicable.

Description	2020	2021	2022	2023	2024
•					
	183	222	439	650	736
	203	259	285	226	194
Methanol (Methyl alcohol), other than imported only					
for use in producing synthetic natural gas (SNG) or					
for direct use as fuel	249	472	377	185	179
T-shirts, singlets, tank tops and similar garments,					
knitted or crocheted, of man-made fibers	97	130	163	111	80
Polystyrene, expandable, in primary forms	55	70	79	57	54
Sweaters, pullovers and similar articles, knitted or					
crocheted, of manmade fibers, n.e.s.o.i.	110	141	112	87	53
Sweaters, pullovers and similar articles, knitted or					
crocheted, of cotton, n.e.s.o.i.	62	105	85	46	53
·					
·	30	31	31	42	43
· · · · · · · · · · · · · · · · · · ·					
• • •	24	58	50	53	38
					2.5
·	Ü	Ü	30	35	36
	24	4.2	22	25	22
• •	21	12	33	35	32
•	22	20	27	11	28
	23	38	37	41	28
•	264	105	600	70	27
crude, testing 25 degrees A.P.I. of more	304	103	600	79	21
_	385	467	170	32/	280
	303	+07	7/3	J 24	200
_	1.808	2.191	2.801	1.973	1,836
	Description Petroleum oils and oils from bituminous minerals, crude, testing under 25 degrees A.P.I. T-shirts, singlets, tank tops and similar garments, knitted or crocheted, of cotton Methanol (Methyl alcohol), other than imported only for use in producing synthetic natural gas (SNG) or for direct use as fuel T-shirts, singlets, tank tops and similar garments, knitted or crocheted, of man-made fibers Polystyrene, expandable, in primary forms Sweaters, pullovers and similar articles, knitted or crocheted, of manmade fibers, n.e.s.o.i. Sweaters, pullovers and similar articles, knitted or	Petroleum oils and oils from bituminous minerals, crude, testing under 25 degrees A.P.I. 183 T-shirts, singlets, tank tops and similar garments, knitted or crocheted, of cotton 203 Methanol (Methyl alcohol), other than imported only for use in producing synthetic natural gas (SNG) or for direct use as fuel 249 T-shirts, singlets, tank tops and similar garments, knitted or crocheted, of man-made fibers 97 Polystyrene, expandable, in primary forms 55 Sweaters, pullovers and similar articles, knitted or crocheted, of manmade fibers, n.e.s.o.i. 110 Sweaters, pullovers and similar articles, knitted or crocheted, of cotton, n.e.s.o.i. 62 Fresh or chilled yams, whether or not sliced or in the form of pellets 30 Men's/boys' trousers, breeches, shorts, not k/c, synth fibers, con under 15% wt down etc, cont und 36% wt wool, n/water resist, not rec perf outwear 24 Other food preps n.e.s.o.i., incl preps for the manufacture of beverages, non-dairy coffee whiteners, herbal teas and flavored honey 0 Other cane sugar, raw, in solid form, w/o added flavoring or coloring, subject to add. US 5 to Ch.17 21 Men's or boys' shirts, not knitted or crocheted, of manmade fibers, n.e.s.o.i. 23 Petroleum oils and oils from bituminous minerals,	Petroleum oils and oils from bituminous minerals, crude, testing under 25 degrees A.P.I. T-shirts, singlets, tank tops and similar garments, knitted or crocheted, of cotton Methanol (Methyl alcohol), other than imported only for use in producing synthetic natural gas (SNG) or for direct use as fuel T-shirts, singlets, tank tops and similar garments, knitted or crocheted, of man-made fibers Polystyrene, expandable, in primary forms Sweaters, pullovers and similar articles, knitted or crocheted, of man-made fibers Polystyrene, expandable, in primary forms Sweaters, pullovers and similar articles, knitted or crocheted, of manmade fibers, n.e.s.o.i. Sweaters, pullovers and similar articles, knitted or crocheted, of cotton, n.e.s.o.i. Fresh or chilled yams, whether or not sliced or in the form of pellets Men's/boys' trousers, breeches, shorts, not k/c, synth fibers, con under 15% wt down etc, cont und 36% wt wool, n/water resist, not rec perf outwear Other food preps n.e.s.o.i., incl preps for the manufacture of beverages, non-dairy coffee whiteners, herbal teas and flavored honey Other cane sugar, raw, in solid form, w/o added flavoring or coloring, subject to add. US 5 to Ch.17 Men's or boys' shirts, not knitted or crocheted, of manmade fibers, n.e.s.o.i. Petroleum oils and oils from bituminous minerals, crude, testing 25 degrees A.P.I. or more 385 467	Description202020212022Petroleum oils and oils from bituminous minerals, crude, testing under 25 degrees A.P.I.183222439T-shirts, singlets, tank tops and similar garments, knitted or crocheted, of cotton203259285Methanol (Methyl alcohol), other than imported only for use in producing synthetic natural gas (SNG) or for direct use as fuel249472377T-shirts, singlets, tank tops and similar garments, knitted or crocheted, of man-made fibers97130163Polystyrene, expandable, in primary forms557079Sweaters, pullovers and similar articles, knitted or crocheted, of manmade fibers, n.e.s.o.i.110141112Sweaters, pullovers and similar articles, knitted or crocheted, of cotton, n.e.s.o.i.6210585Fresh or chilled yams, whether or not sliced or in the form of pellets303131Men's/boys' trousers, breeches, shorts, not k/c, synth fibers, con under 15% wt down etc, cont und 36% wt wool, n/water resist, not rec perf outwear245850Other food preps n.e.s.o.i., incl preps for the manufacture of beverages, non-dairy coffee whiteners, herbal teas and flavored honey0030Other cane sugar, raw, in solid form, w/o added flavoring or coloring, subject to add. US 5 to Ch.17211233Men's or boys' shirts, not knitted or crocheted, of manmade fibers, n.e.s.o.i.233837Petroleum oils and oils from bituminous minerals, crude, testing 25 degrees A.P.I. or more364185600	Petroleum oils and oils from bituminous minerals, crude, testing under 25 degrees A.P.I. T-shirts, singlets, tank tops and similar garments, knitted or crocheted, of cotton Methanol (Methyl alcohol), other than imported only for use in producing synthetic natural gas (SNG) or for direct use as fuel T-shirts, singlets, tank tops and similar garments, knitted or crocheted, of man-made fibers Rollystyrene, expandable, in primary forms Sweaters, pullovers and similar articles, knitted or crocheted, of man-made fibers, n.e.s.o.i. Sweaters, pullovers and similar articles, knitted or crocheted, of manmade fibers, n.e.s.o.i. Fresh or chilled yams, whether or not sliced or in the form of pellets Men's/boys' trousers, breeches, shorts, not k/c, synth fibers, con under 15% wt down etc, cont und 36% wt wool, n/water resist, not rec perf outwear Other food preps n.e.s.o.i., incl preps for the manufacture of beverages, non-dairy coffee whiteners, herbal teas and flavored honey Other cane sugar, raw, in solid form, w/o added flavoring or coloring, subject to add. US 5 to Ch.17 Men's or boys' shirts, not knitted or crocheted, of manmade fibers, n.e.s.o.i. Petroleum oils and oils from bituminous minerals, crude, testing 25 degrees A.P.I. or more 280 2022 439 222 439 225 248 226 226 227 439 228 227 439 228 228 228 229 228 229 228 229 228 229 228 229 228 229 229

Table F.6 Leading U.S. imports for consumption under CBERA, by source and HTS subheading, 2020–24 In thousands of dollars. n.e.s.o.i. = not elsewhere specified or included; — (em dash) = not applicable; ** = rounds to zero.

	HTS						
Source	subheading	Description	2020	2021	2022	2023	2024
Antigua &		Paints and varnishes (including enamels and lacquers) based on					
Barbuda	3209.10.00	acrylic or vinyl polymers in an aqueous medium	0	0	0	11	0
		Fuel, lubricating or cooling medium pumps for internal-					
Antigua &		combustion piston engines, not fitted with a measuring device,					
Barbuda	8413.30.90	n.e.s.o.i.	0	0	7	0	0
Antigua &		Tailors' dummies and other mannequins; automatons and other					
Barbuda	9618.00.00	animated displays used for shop window dressing	10	0	0	0	0
		Precious metal (other than silver) articles of jewelry and parts					
Antigua &		therefor, whether or not plated or clad with precious metal,					
Barbuda	7113.19.50	n.e.s.o.i.	11	0	0	0	0
		Imitation jewelry (other than toy jewelry & rope, curb, cable,					
Antigua &		chain, etc.), of base metal (wheth. or not plated with					
Barbuda	7117.19.90	prec.metal), n.e.s.o.i.	14	0	0	0	0
Antigua &	All other						
Barbuda	products	_	0	0	0	0	0
Antigua &	Total, all						
Barbuda	products	_	36	0	7	11	0
		Cycles (other than bicycles) (including delivery tricycles), not					
Aruba	8712.00.50	motorized	0	0	0	0	4
		Handbags with or without shoulder strap or without handle, with					
		outer surface of textile materials, wholly or in part of braid,					
Aruba	4202.22.40	n.e.s.o.i.	5	0	3	2	4
Aruba	3307.20.00	Personal deodorants and antiperspirants	15	9	12	13	2
		Mineral waters and aerated waters, not containing added sugar					
Aruba	2201.10.00	or other sweetening matter nor flavored	0	0	0	40	0
		Iron or steel, screws and bolts, n.e.s.o.i., having shanks or					
Aruba	7318.15.60	threads less than 6 mm in diameter	0	0	0	8	0
	All other						
Aruba	products	_	11	203	19	2	0
	Total, all						
Aruba	products	_	32	212	35	64	11
Bahamas	3903.11.00	Polystyrene, expandable, in primary forms	55,365	70,195	78,964	57,495	54,414
Bahamas	0511.99.36	Natural sponges of animal origin	696	755	699	453	349

	HTS						
Source	subheading	Description	2020	2021	2022	2023	2024
Bahamas	8903.93.20	Outboard motorboats, length not over 7.5m	0	0	0	0	226
		Crabmeat, prepared or preserved, other than in airtight					
Bahamas	1605.10.40	containers	351	356	413	91	181
		Iron or steel, threaded articles similar to screws, bolts, nuts,					
Bahamas	7318.19.00	coach screws & screw hooks, n.e.s.o.i.	0	0	0	0	149
	All other						
Bahamas	products	_	338	172	287	430	81
	Total, all						
Bahamas	products	_	56,751	71,478	80,363	58,468	55,400
Barbados	0910.99.60	Spices, n.e.s.o.i.	168	206	369	341	349
		Mineral waters and aerated waters, not containing added sugar					
Barbados	2201.10.00	or other sweetening matter nor flavored	100	68	13	37	29
Barbados	1517.90.90	Edible mixt. & preps, n.e.s.o.i.	17	29	44	35	28
		Other food preps n.e.s.o.i., includes preps for the manufacture of					
		beverages, non-dairy coffee whiteners, herbal teas and flavored					
Barbados	2106.90.99	honey	0	0	16	4	21
Barbados	2104.10.00	Soups and broths and preparations therefor	0	0	0	0	12
	All other						
Barbados	products	_	7,282	476	195	371	10
	Total, all						
Barbados	products	_	7,567	779	637	787	449
		Other cane sugar, raw, in solid form, to be used for certain					
Belize	1701.14.20	polyhydric alcohols	0	0	0	0	14,953
		Other cane sugar, raw, in solid form, without added flavoring or					
Belize	1701.14.10	coloring, subject to add. US 5 to Ch.17	8,489	8,108	9,258	11,275	13,793
Belize	2103.90.90	Sauces and preparations therefor, n.e.o.s.i.	633	1,664	1,800	2,085	1,953
Belize	0807.20.00	Papayas (papaws), fresh	191	314	395	303	901
		Citrus juice of any single citrus fruit (other than orange,					
		grapefruit or lime), of a Brix value not exceeding 20,					
Belize	2009.31.60	concentrated, unfermented	0	0	218	334	449
	All other						
Belize	products	_	6,127	5,750	9,305	709	439
	Total, all						
Belize	products	_	15,439	15,835	20,975	14,706	32,488
British Virgin		Measuring and checking instruments, appliances and machines,					
Islands	9031.80.80	n.e.s.o.i.	0	0	0	0	0

	HTS						
Source	subheading	Description	2020	2021	2022	2023	2024
British Virgin		Binder or baler twine of wide nonfibrillated strip, of polyethylene					
Islands	5607.41.10	or polypropylene	0	0	0	0	0
British Virgin		Ceiling fans for permanent installation, with a self-contained					
Islands	8414.51.30	electric motor of an output not exceeding 125 W	0	0	0	0	0
British Virgin	Total, all						
Islands	products	_	0	0	0	0	0
_		Undenatured ethyl alcohol of an alcoholic strength by volume of					
Curacao	2208.90.80	less than 80 percent vol., n.e.s.o.i	48	51	50	54	39
		Distillate and residual fuel oil (including blends) derived from					
_		petroleum or oils from bituminous minerals, testing < 25 degrees	_			_	
Curacao	2710.19.06	A.P.I.	0	0	15,380	0	0
	2224 22 22	Parachutes (including dirigible parachutes) and rotochutes; parts		•	-4-		
Curacao	8804.00.00	& access. Thereof	0	0	717	0	0
	0526.60.00	Plugs and sockets for making connections to or in electrical	0	0	74	•	
Curacao	8536.69.80	circuits, for a voltage not exceeding 1,000 V, n.e.s.o.i.	0	0	71	0	0
		Precious metal (o/than silver) articles of jewelry and parts					
C	7442 40 50	therefor, whether or not plated or clad with precious metal,	0	26	0	0	0
Curacao	7113.19.50	n.e.s.o.i.	0	26	0	0	0
C	All other		107	20	0	0	0
Curacao	products	_	107	29	0	0	0
C	Total, all		155	105	16 217	Γ4	20
Curacao	products	Mintropage of fronth incidence are resintenced of concentrated a conditional incidence	155	105	16,217	54	39
		Mixtures of fruit juices, or mixtures of vegetable and fruit juices, concentrated or not concentrated					
Dominica	2009.90.40	concentrated of not concentrated	0	0	0	0	97
Dominica	2009.90.40	Pre-shave, shaving or after-shave preparations, containing	U	U	U	U	97
		alcohol					
Dominica	3307.10.20	dicolloi	6	8	4	5	0
Dominica	3307.10.20	Fresh or chilled taro (Colocasia spp.), whether or not sliced or in	O	٥	4	3	U
		the form of pellets					
Dominica	0714.40.10	the form of penets	0	9	0	0	0
Dominica	0/14.40.10	Precious metal (other than silver) rope, curb, etc. in continuous	U	9	9	U	U
		lengths, whether or not plated/clad precious metal, for jewelry					
Dominica	7113.19.10	manufacture	43	0	0	0	0
Dominica	Total, all	manuraccure	43	U	U	U	U
Dominica	products	_	50	17	13	5	97
Dominica	products		30	1/	10	J	37

	HTS						
Source	subheading	Description	2020	2021	2022	2023	2024
		Cashew apples, mameyes colorados, sapodillas, soursops and					
Grenada	0811.90.25	sweetsops, frozen, in water or containing added sweetening	1,528	1,572	2,562	2,374	2,251
Grenada	0810.90.46	Fruit, not elsewhere specified or included, fresh	926	1,039	1,286	780	530
		Plums, prunes and sloes, fresh, if entered during the period from					
Grenada	0809.40.40	June 1 through December 31, inclusive	0	0	54	96	60
Grenada	2007.99.50	Guava and mango pastes and purees, being cooked preparations	0	0	0	8	4
		Bean cake, bean stick, miso, other fruit, nuts and other edible					
Grenada	2008.99.91	parts of plans, prepared or preserved	0	0	0	0	3
	All other						
Grenada	products	-	32	25	73	26	0
	Total, all						
Grenada	products	_	2,485	2,637	3,975	3,283	2,848
		Other cane sugar, raw, in solid form, w/o added flavoring or					
Guyana	1701.14.10	coloring, subject to add. US 5 to Ch.17	0	0	20,285	19,032	14,773
Guyana	2103.90.90	Sauces and preparations therefor, n.e.o.s.i.	375	306	440	457	579
Guyana	1517.10.00	Margarine, excluding liquid margarine	130	182	251	243	271
		Juice of any other single fruit, n.e.s.o.i., (including berries),					
Guyana	2009.89.70	concentrated or not concentrated	0	0	634	337	205
		Waters, including mineral waters and aerated waters, containing					
Guyana	2202.10.00	added sugar or other sweetening matter or flavored	74	113	169	185	195
	All other						
Guyana	products	_	264,816	187,690	510,256	80,049	659
	Total, all						
Guyana	products	_	265,394	188,291	532,034	100,303	16,682
		T-shirts, singlets, tank tops and similar garments, knitted or					
Haiti	6109.10.00	crocheted, of cotton	203,349	259,162	285,274	226,424	194,341
		T-shirts, singlets, tank tops and similar garments, knitted or					
Haiti	6109.90.10	crocheted, of man-made fibers	97,364	130,457	163,390	111,370	79,682
		Sweaters, pullovers and similar articles, knitted or crocheted, of					
Haiti	6110.30.30	manmade fibers, n.e.s.o.i.	109,790	141,353	111,877	87,134	53,441
		Sweaters, pullovers and similar articles, knitted or crocheted, of					
Haiti	6110.20.20	cotton, n.e.s.o.i.	62,406	105,181	85,149	46,310	53,117
	All other						
Haiti	products	_	92,237	98,501	81,526	75,021	92,237
	Total, all						
Haiti	products	_	768,208	1,029,598	991,033	756,283	593,355

	HTS						
Source	subheading	Description	2020	2021	2022	2023	2024
		Fresh or chilled yams (Dioscorea spp.), whether or not sliced or					
Jamaica	0714.30.10	in the form of pellets	30,108	30,526	30,516	41,934	42,742
Jamaica	2103.90.90	Sauces and preparations therefor, n.e.o.s.i. Other food preps n.e.s.o.i., incl preps for the manufacture of	16,001	21,212	17,530	21,305	19,320
		beverages, non-dairy coffee whiteners, herbal teas and flavored					
Jamaica	2106.90.99	honey	0	0	7,658	10,527	9,297
		Bean cake, bean stick, miso, other fruit, nuts and other edible					
Jamaica	2008.99.91	parts of plans, prepared or preserved	6,806	8,732	9,474	9,032	6,918
		Vegetables n.e.s.o.i., & mixtures of vegetables, prepared or preserved otherwise than by vinegar or acetic acid, not frozen,					
Jamaica	2005.99.97	not preserved by sugar	5,878	6,872	8,268	8,663	6,809
Jamaica	All other		50,243	55,194	60,400	50,126	45,804
	Total, all						
Jamaica	products	_	109,036	122,535	133,846	141,588	130,889
		Boards, panels, consoles, desks, cabinets and other bases,					
St. Kitts &		equipped with apparatus for electric control, for a voltage					
Nevis	8537.20.00	exceeding 1,000 V	325	321	1,103	1,456	1,661
St. Kitts &		Electrical transformers other than liquid dielectric, having a					
Nevis	8504.31.40	power handling capacity less than 1 kVA	2,208	2,909	2,871	2,860	1,561
		Other boards, panels, consoles, desks, cabinets, etc., equipped					
St. Kitts &		with apparatus for electric control, for a voltage not exceeding					
Nevis	8537.10.91	1,000, n.e.s.o.i	570	1,214	2,683	1,951	1,537
St. Kitts &							
Nevis	3926.90.99	Other articles of plastic, n.e.s.o.i	0	**	9	2	0
		Planing, milling or molding (by cutting) machines for working					
St. Kitts &		wood, cork, bone, hard rubber, hard plastics or similar hard	_	_			_
Nevis	8465.92.00	materials	0	0	19	0	0
St. Kitts &	AU		204	4.54	22	•	•
Nevis	All other	_	204	161	22	0	0
St. Kitts &	Total, all		2 207	4.000	c 700	C 2C0	4.760
Nevis	products		3,307	4,606	6,708	6,269	4,760
St. Lucia	2103.90.90	Sauces and preparations therefor, n.e.o.s.i.	528	510	667	726	390
		Other food preps n.e.s.o.i., incl preps for the manufacture of					
St Lucia	2106 00 00	beverages, non-dairy coffee whiteners, herbal teas and flavored	0	0	117	110	0.4
St. Lucia	2106.90.99	honey	0 6	2	117 0	118 0	84
St. Lucia	0709.99.05	Jicamas and breadfruit, fresh or chilled	б	2	U	U	3

	HTS						
Source	subheading	Description	2020	2021	2022	2023	2024
		Bean cake, bean stick, miso, other fruit, nuts and other edible					
St. Lucia	2008.99.91	parts of plans, prepared or preserved	0	0	0	0	3
St. Lucia	2007.99.45	Jams, n.e.s.o.i.	0	7	6	9	0
St. Lucia	All others	_	41	80	85	0	0
	Total, all						
St. Lucia	products	_	575	599	875	853	480
St. Vincent &		Fresh or chilled taro (Colocasia spp.), whether or not sliced or in					
the Grenadines	0714.40.10	the form of pellets	0	0	40	40	0
St. Vincent &		Women's or girls' dresses, not knitted or crocheted, of textile					
the Grenadines	6204.49.50	materials n.e.s.o.i.	0	0	0	**	0
St. Vincent &		Women's or girls' blouses, shirts and shirt-blouses, not knitted or					
the Grenadines	6206.90.00	crocheted, of textile materials n.e.s.o.i.	0	0	0	**	0
St. Vincent &							
the Grenadines	0910.99.60	Spices, n.e.s.o.i.	0	0	90	0	0
St. Vincent &		Fresh or chilled yautia (Xanthosoma spp.), whether or not sliced					
the Grenadines	0714.50.10	or in the form of pellets	0	24	0	0	0
St. Vincent &							
the Grenadines	All others	_	0	0	0	0	0
St. Vincent &	Total, all						
the Grenadines	products	_	0	24	129	41	0
Trinidad &	,	Petroleum oils and oils from bituminous minerals, crude, testing	-		-		-
Tobago	2709.00.10	under 25 degrees A.P.I.	183,139	221,815	438,633	650,170	736,226
Trinidad &		Methanol (Methyl alcohol), other than imported only for use in	,	,	,	,	,
Tobago	2905.11.20	producing synthetic natural gas (SNG) or for direct use as fuel	248,629	472,253	377,058	185,084	179,095
Trinidad &		Petroleum oils and oils from bituminous minerals, crude, testing	,	,	011,000		_, _,
Tobago	2709.00.20	25 degrees A.P.I. or more	101,381	0	91,236	0	27,499
		Other food preps n.e.s.o.i., incl preps for the manufacture of			5 _, 5		_,,.55
Trinidad &		beverages, non-dairy coffee whiteners, herbal teas and flavored					
Tobago	2106.90.99	honey	0	0	22,268	24,708	27,031
Trinidad &	2100.50.55	noncy	Ü	· ·	22,200	24,700	27,031
Tobago	2933.61.00	Melamine	8,117	19,876	58,730	5,300	4,190
Trinidad &	2333.01.00	THE COLUMN TO TH	0,117	13,070	33,730	3,300	7,130
Tobago	All others	_	37,803	40,020	26,234	25,471	24,026
Trinidad &	Total, all		37,003	70,020	20,234	20,711	2-1,020
Tobago	products	_	579,070	753 963	1,014,159	890,733	998,067

Table F.7 U.S. imports for consumption, by sector and year, 2020–24 In millions of dollars (\$). ** = rounds to zero.

Sector	2020	2021	2022	2023	2024
Energy-related products	547	407	1,072	729	764
Textiles and apparel	750	1,010	978	752	590
Chemicals and related products	318	574	526	258	248
Agricultural products	185	193	214	225	228
Electronic products	1	2	4	4	3
Machinery	4	4	4	4	2
Miscellaneous manufactures	1	1	1	1	**
Minerals and metals	**	**	**	**	**
Transportation equipment	**	**	1	**	**
Forest products	1	**	**	**	**
Footwear	**	**	**	**	**
All sectors	1,808	2,191	2,801	1,973	1,836