



June 20, 2025

The Honorable Jamieson Greer
United States Trade Representative
Office of the United States Trade Representative
600 17th Street, NW Washington, DC 20508

RE: Recent Efforts by Uganda to Again Ban Secondhand Clothing (HTS 6309) Imports in Violation of AGOA Obligations

Dear Ambassador Greer:

I am writing on behalf of the Secondary Materials and Recycled Textiles Association (SMART), a U.S.-based trade association representing the backbone of the global supply chain for secondhand textiles. Our members include collectors, wholesalers, sorters, and exporters of secondhand clothing (HTS 6309) and other pre- and post-consumer textiles, working to keep these materials out of landfills and in productive use.

In 2016, SMART worked closely with the Office of the United States Trade Representative to push back successfully against a proposed East African Community (EAC) ban on imports of secondhand clothing, under the African Growth and Opportunity Act (AGOA). We remain grateful for the leadership shown by USTR and the Trump Administration, which helped reverse what would have been a deeply damaging ban for both our industry and for communities across the region that rely on access to affordable clothing.

Unfortunately, we have recently obtained a government communication indicating that Uganda is once again moving toward implementation of such a ban. The attached June 5, 2025 letter from the Ugandan Ministry of Trade, Industry and Co-operatives to the Uganda Revenue Authority outlines plans to require importers of secondhand clothing to obtain special import licenses—available only to a limited number of recipients. Of particular concern is the letter's assertion that, ***“The issuance of limited permits is intended to allow a gradual phase down of the imports to support the growth of the domestic textiles sector in compliance with H.E. the President’s directive.”***

An even more recent letter (attached) dated June 16, 2025 from the Uganda Revenue Authority to all Ugandan Customs staff confirms that the government is moving swiftly to implement these new requirements. The letter states that import permits will now be required for all goods classified under HTS 6309, effective immediately. Notably, it reiterates that the purpose of these

permits is to, “...*gradually phase out importation of used/second clothing and apparels [sic], which in turn is expected to boost the growth of the domestic textiles sector.*”

This policy direction appears to reflect President Museveni’s [public remarks](#) from August 2023, made shortly after he commissioned 16 new factories at the Sino-Uganda Mbale Industrial Park—including several Chinese-owned facilities producing new garments. While USTR negotiators were previously advised not to place too much weight on those comments, the latest communications suggest a clear and coordinated shift in policy that would benefit foreign direct investors—particularly Chinese apparel manufacturers—at the direct expense of U.S. exports and Uganda’s trade commitments under AGOA.

Any pursuit of such a ban would not only represent a reversal of Uganda’s previously negotiated commitments, but also risk prompting other EAC countries to follow suit. More fundamentally, it would be a clear violation of Uganda’s obligations under AGOA, which requires participating countries to ensure open market access for U.S. exports and investment. It would also undermine the terms of the 2016 settlement negotiated by the Trump Administration at that time that helped avert widespread trade disruption and preserved Uganda’s eligibility for AGOA benefits.

In light of these developments, we respectfully urge USTR to follow up directly with the Government of Uganda to reaffirm the United States’ expectations under AGOA and the importance of honoring prior trade commitments. We would also appreciate the opportunity to meet with you or your team to discuss this matter further and to share additional context from our members who are directly impacted by these restrictions. Please let us know a convenient time to connect—we stand ready to assist in any way that would support USTR’s engagement on this issue.

On behalf of SMART, I would like to thank you for your attention to this matter. If you have any questions or need additional information, I can be reached directly at (703) 772-7038 or jessica@thefrankengroup.com.

Sincerely,



Jessica Franken
Director of Government Affairs
Secondary Materials and Recycled Textiles Association (SMART)
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