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## AMBA Files Formal Comments with U.S. Government to Reinstate Chinese Mold Tariffs

Indianapolis, IN – On November 29, the AMBA filed formal comments with the Office of the U.S. Trade Representative (USTR) requesting it not extend the exclusion granted to importers from paying a 25 percent tariffs on plastic injection molds from China for another year. Importers and manufacturers had until November 30, 2019, to register their support or opposition for extending the tariff suspension or reinstating the 25 percent tariff on Chinese imports. The comments were requested ahead of the scheduled December 28, 2019, deadline, when the USTR is scheduled to reinstate the tariffs.

"AMBA members report they have the capacity, capabilities, and willingness to meet current and future mold building demand," the AMBA comments stated. To counter the lack of supply argument presented by some importers, AMBA demonstrated to the federal government that the U.S. has 1,439 mold building establishments; has nearly \$500 million in open mold building capacity; maintains a utilization rate of 75%; can match China delivery times while exceeding quality; that molds are available from third countries with Canada the largest importer; and that U.S. molds are critical to national and economic security.

The formal submission to USTR identified, "A recent survey by Harbour Results, Inc., manufacturing consultants with an expertise in downstream industries, showed that 60 percent of mold builders reported losing more business in 2019 to low-cost countries compared to previous years."

"We recognize the challenges seeking structural reforms in China and applaud USTR for working to address these issues long overlooked by previous administrations," said Kym Conis, managing director with the AMBA. She continued, "However, we remain concerned too many [import exclusion] requesters are using price as their primary motivation for requesting a 301 tariff exclusion extension and have not made significant efforts to identify U.S. or third-country alternatives, which are readily available."

In July 2018, the U.S. Government imposed a 25% tariff on imported plastic injection molds from China, however, granted a twelve month exclusion from the tariffs for U.S. importers on December 28, 2018. Over 150 mold building manufacturers have filed comments opposing an extension of the tariff suspension, clearly demonstrating sufficient capacity exists in the U.S. to meet the demand from importers.

The AMBA looks forward to working with the Trump administration to strengthen manufacturing in the U.S. and making sure American mold builders continue to provide thousands of jobs across this country and supplying plastic injection molds for decades to come.

To view the AMBA comments filed on November 29, click here.

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Established in 1973, the American Mold Builders Association (AMBA) is the largest grassroots organization in the United States dedicated solely to the mold manufacturing industry. As a national non-

profit trade association serving over 200 member companies and over 50 partner companies (supplier members), AMBA provides its members with access to the most powerful networking in the industry.