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Lisa Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, SW
Washington, D.C., 20436

Summary of Written Submission (For Inclusion in Report)

Investigation No. 332-590

U.S.-Haiti Trade: Impact of U.S. Preference Programs on Haiti's Economy and Workers

Dear Secretary Barton:

The Institute for Justice & Democracy in Haiti (IJDH) is a U.S. non-profit organization working in partnership with the Haiti-based public interest law firm, the *Bureau des Avocats Internationaux* (BAI), and in solidarity with Haitian communities to tackle the root causes of injustice impacting human rights.

In order to respect and protect Haitians' human rights, foreign investment must reflect a Haitian-led, rights-based approach that is in line with international legal standards. However, in its submission, IJDH highlights how the U.S. is imposing economic reforms and trade agreements that allow foreign corporations to facilitate and benefit from workers' rights abuses and that impede Haiti's food sovereignty, ultimately breaching its extraterritorial obligations.

U.S. companies, enabled by U.S. trade incentives, continue to buy apparel manufactured in factories – often themselves owned or operated by foreign companies – that do not meet minimum international labor standards. Garment factories throughout Haiti have repeatedly been found to violate Haitian and international labor laws. Allegations of workers' rights violations include workplace sexual harassment, benefits theft, illegal firing of workers who unionize, and polluting waste - to name a few. Meanwhile, there is no evidence that these companies have ever lost the benefits provided by the U.S. HOPE/HELP legislation.

Moreover, by funding initiatives like Caracol Industrial Park - one of the largest industrial parks in the Caribbean and one of Haiti's two primary industrial parks whose development significantly expanded American manufacturing in Haiti - foreign states like the U.S. are undercutting Haiti's food sovereignty and compounding extreme food insecurity by encouraging the Haitian government to convert huge swaths of fertile land to factories or other export industries.

More broadly, "assistance" conditions imposed on Haiti since the 1980s by the international community, and in particular the U.S., have facilitated the replacement of critical subsistence agriculture with this problematic garment industry that prioritizes foreign interests and exploits cheap labor. These conditions have simultaneously resulted in a dependence on the global marketplace for food, which has led to a protracted and worsening food crisis in Haiti and amplified the country's vulnerability to starvation and malnutrition, as well as natural disasters, like earthquakes and pandemics. This has ultimately impeded the ability of Haitian people, and their future generations, to enjoy their right to food, health, education, work, and other fundamental human rights.

Finally, the imposition of economic reforms and trade agreements in Haiti that allow foreign corporations to facilitate and benefit from workers' rights abuses, and that impede Haiti's food sovereignty and Haitians' ability to enjoy their fundamental rights, have ultimately breached states' extraterritorial obligations under international law.

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