

# 4. Silk Apparel

## 1. Definition of Category

Silk apparel other than accessory items such as handkerchiefs, scarves and neckties.

### HS Numbers

6206.10-100, 10-210, 10-220  
6101 to 6114, 6201 to 6211 (in part)

### Commodity

Women's silk blouses, shirts, etc.  
Other silk apparel

*Note: The HS Numbers "other silk apparel" (6101 to 6114, 6201 to 6211 in part) include other apparel. This guidebook concerned in description (include statistical data) about "women's silk blouses, shirts, etc."*

## 2. Import Trends

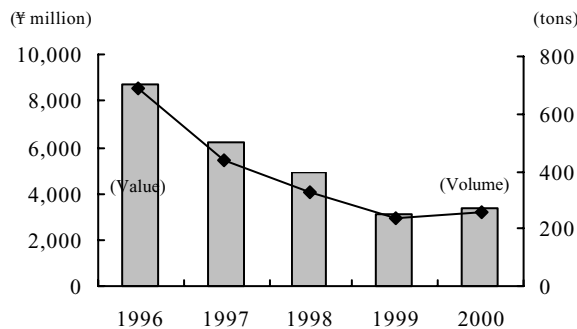
### (1) Recent Trends in Silk Apparel Imports

Imports of silk apparel grew until 1993 due mainly to prices very reasonable prices, but in 1994, imports began showing a downward trend. Behind the decline in imports in recent years is an increased supply of new synthetic fiber products in the market that feature a silk-like luster and a natural touch to the skin as well as high durability. Increased price consciousness among consumers since the collapse of the bubble economy has led to a decline in demand for silk apparel.

In 2000, there was an upswing for the first time in some years, with silk apparel imports rising to 255 tons (up 8.1%), worth some ¥3.29 billion in value with an increase of 6.4% from the previous year.

Conventionally in Japan, silk was mainly used as a material for expensive traditional Japanese garments called *wafuku*. Now, however, Western garments such as shirts and blouses account for the majority of imported products. In recent years, the application of silk has become widespread. Imported silk underwear is gaining popularity. In the case of silk product sewing factories, except for some expensive Japanese traditional garments, a shift has been underway from Japan to overseas countries, mainly China.

**Fig. 1 Japan's silk apparel imports**



	1996		1997		1998		1999		2000	
	Volume	Value	Volume	Value	Volume	Value	Volume	Value	Volume	Value
Silk apparel	689	8,690	440	6,226	326	4,987	236	3,094	255	3,292

Units: tons, ¥ million

Note: totals of women's silk blouses, shirts, etc.

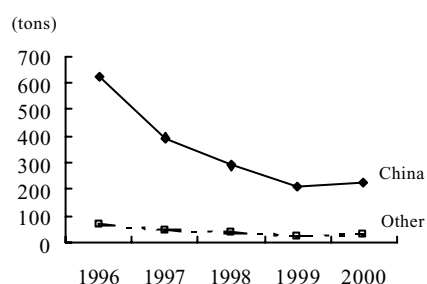
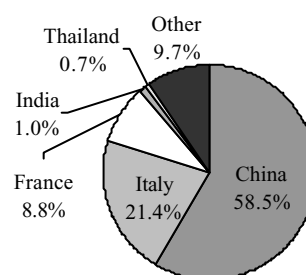
Source: Japan Exports and Imports

### (2) Imports by Place of Origin

China is the largest exporter of silk apparel to Japan with a significant share of 87.2% in 2000 on a volume basis, while European countries such as Italy and France together account for 35.0% of all imports on a value basis. (see Fig. 2)

### (3) Imports' Market Share in Japan

Because official statistic data doesn't exist, the share of import products is not clear. According to industry sources, imports' share of silk shirts and blouse for women is estimated at about 60% and underwear for women is about 10%.

**Fig. 2 Principal exporters of silk apparel to Japan****Trends in import volume by leading exporters****Shares of silk apparel imports in 2000 (value basis)**

	1996	1997	1998	1999		2000			
	Volume	Volume	Volume	Volume	Value	Volume	Value	Volume	Value
China	623	393	289	211	1,859	222	87.2%	1,925	58.5%
Italy	34	23	17	10	642	14	5.4%	703	21.4%
France	7	7	4	2	263	4	1.6%	289	8.8%
Thailand	0	2	1	2	17	4	1.4%	24	0.7%
India	2	1	1	1	13	3	1.3%	31	1.0%
Others	23	15	14	11	300	8	3.1%	319	9.7%
<b>TOTAL</b>	<b>689</b>	<b>440</b>	<b>326</b>	<b>236</b>	<b>3,094</b>	<b>255</b>	<b>100.0%</b>	<b>3,292</b>	<b>100.0%</b>
(E U)	46	33	25	14	1,081	20	7.8%	1,153	35.0%

Units: tons ¥ million

Note: totals of women's silk blouses, shirts, etc.

Source: Japan Exports and Imports

**3. Key Considerations related to Importing****(1) Regulations and Procedural Requirements at the Time of Importation**

Silk apparel itself is not subject to any type of import restriction, and may freely be brought into Japan. However, if a silk garment includes decorative trim made from certain types of fur or leather, it may be subject to provisions of Foreign Exchange and Foreign Trade Law based on the Washington Convention (Convention on International Trade in Endangered Species of Wild Fauna and Flora, so-called CITES). For more details, refer to "II-1 Fur and Fur Products" in this guidebook, or contact the Trade Licensing Division, Trade and Economic Cooperation Bureau, Ministry of Economy, Trade and Industry.

**(2) Regulations and Procedures at the Time of Sale**

The sale of silk apparel is subject to provisions of the Household Goods Quality Labeling Law, the Law for Control of Household Products Containing Harmful Substances, and the Act Against Unjustifiable Premiums and Misleading Representations.

**1) Household Goods Quality Labeling Law.**

When selling silk apparel, it is subject to labeling requirements imposed by the Household Goods Quality Labeling Law. (see 4. Labeling)

**2) The Law for Control of Household Products Containing Harmful Substances**

The Law established content standards substances present in textile products that may cause damage to the skin (including formalin and dieldrin). Textile products with a formalin content of 75 ppm or greater may not be sold in Japan. This requirement also applies to imported products.

**3) Act Against Unjustifiable Premiums and Misleading Representations**

The Act establishes country of origin label standards so that consumers will not make a Japanese-made products for a foreign-made products, and so they can readily identify the country of origin. Products with vague, confusing or misleading labeling regarding the country of origin may not imported.

**(3) Competent Agencies**

- Household Goods Quality Labeling Law  
Consumer Affairs Policy Division, Consumer Affairs Department, Commerce and Information Policy Bureau, Ministry of Economy, Trade and Industry

TEL: 03-3501-1511

<http://www.meti.go.jp>

- Law for Control of Household Products Containing Harmful Substances  
Safety Division, Pharmaceutical and Medical Safety Bureau, Ministry of Health, Labour and Welfare  
TEL: 03-5253-1111 <http://www.mhlw.go.jp>
- Foreign Exchange and Foreign Trade Law  
Trade Licensing Division, Trade and Economic Cooperation Bureau, Ministry of Economy, Trade and Industry  
TEL: 03-3501-1511 <http://www.meti.go.jp>
- Act Against Unjustifiable Premiums and Misleading Representations  
Consumer Related Trade Division, Trade Practices Department, Fair Trade Commission of Japan  
TEL: 03-3581-5471 <http://www.jftc.go.jp>

## 4. Labeling

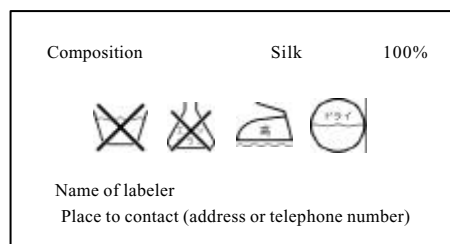
### (1) Legally Required Labeling

#### 1) Household Goods Quality Labeling Law

The Household Goods Quality Labeling Law sets labeling requirements for textile products. Silk apparel must be labeled with the following information:

- Composition of fiber  
The fiber used for the product must be indicated using the designated terminology. Further, the ratio of each fiber used in the product must be indicated by percentage to show the mixture.
- Home washing and other methods of handling  
The method of home washing and other suitable handling must be indicated using handling marks prescribed in JIS L 0217 (Labeling Marks for Handling of Textile Products and Other Labeling Methods).
- Water repellency  
Apparel such as raincoats given special coatings must be labeled to indicate water repellency.
- Indication of type of leather for products partially using leather  
Apparel partially using leather or synthetic leather must be labeled to indicate the type of leather in accordance with the provisions on quality labeling of miscellaneous industrial products under the Household Goods Quality Labeling Law.
- Labeler  
The name and address or telephone number of the entity responsible for the labeling must be indicated.

#### Example label for silk apparel



#### 2) Act Against Unjustifiable Premiums and Misleading Representations

The Act establishes precise labeling practices for imported products to ensure that consumers do not receive misleading information about the actual place of origin. The term “country of origin” refers to the place where alterations are performed on raw materials to produce a finished product. In the case of apparel products, the country of origin is considered to be the place where the handiwork is performed on cloth fabric to produce the garment.

#### (2) Voluntary Labeling Based on Provisions of Law

<Labeling of Size Under the Japan Industrial Standards Law (JIS Law) >

The Japan Industrial Standardization Law (JIS Law) defines size-labeling standards compliant with standards of the International Standards Organization (ISO).

For more information, please contact:

- Japanese Standards Association TEL: 03-3583-8000 <http://www.jsa.or.jp>



**(3) Voluntary Industry Labeling**

&lt;The Silk Mark&gt;

The Silk Mark is a standardized international logo adopted by the International Silk Association to indicate products made from 100% silk. The Japan Silk Association handles inquires related to the Silk Mark form within Japan.



• The Japan Silk Association Inc., JSA      TEL: 03-3215-1212      <http://ns1.silk-center.or.jp>

**5. Taxes****(1) Customs Duties****Fig. 3 Customs duties on silk apparel**

HS No.	Description	Rate of Duty (%)			
		General	WTO	Preferential	Temporary
6206.10	Women's or girl's blouses, shirts and shirt-blouses:				
-100	1. Containing fur skins	16%	13%	6.5% *Free	
-210	2. Other women's or girl's blouses, shirts and shirt-blouses (1) Blouses, shirt-blouses, open shirts and similar shirts	11.20%	(11.2%)	5.6% *Free	
-220	(2) Other women's or girl's shirts	9%	(9.7%)	Free	
6101~6114	Articles of apparel and clothing accessories, knitted or crocheted	6.4~16.8%	6.1%~12.7%	3.05~+6.35% *Free	
6201~6211	Articles of apparel and clothing accessories, excluding knitted or crocheted	7.8~16%	7.5%~15%	Free~7.5% *Free	

Note 1: *"\*Free" in Preferential Rate is applicable only for Least Less Developed Countries.*

*"+" indicate Prior Allotment Items based on Cabinet Order for Enforcement of the Temporary Tariff Measures Law.*

Note 2: *Refer to "Customs Tariff Schedules of Japan" (published by Japan Tariff Association) etc. for interpretation of tariff table.*

**(2) Consumption Tax**

$(\text{CIF} + \text{Customs duty}) \times 5\%$

**6. Product Characteristics****(1) Comparisons with Japanese Products**

In the past, Japan's imports of silk apparel products were sharply polarized between luxury name-brand products from Europe or the United States, and inexpensive ready-made products from China or other suppliers in Asia. Japanese products were positioned in the mid-range, offering a wide variety of excellent products with outstanding product quality and design characteristics from the luxury end all the way to the low end of the market.

This pattern has begun to break down in recent years, however. China, Hong Kong and other Asian countries/regions now make more products with superior product quality and styling than in the past. There are two main reasons for the advances in product quality by other Asian countries/regions. First of all, Japanese apparel makers have built factories in other Asian countries, provided technical assistance and set up OEM manufacturing arrangements with local apparel makers; imports from these Japanese-owned or guided enterprises are increasingly common. Second, Italy and other Western country apparel makers are also moving into Asia and undertaking technical assistance programs of their own.

Silk fabric is excellent at keeping in body heat, absorbing moisture and drawing moisture away from the skin. Silk also has a delightful soft feeling against the skin. These are the main reasons from the growing popularity of silk apparel products, especially in the intimate apparel field. The rage for health-enhancing products and for natural materials has also served to bolster demand for silk apparel. Although the recession took the edge off demand for silk to some extent, consumers are fully aware of the merits of silk apparel, and domestic demand for silk apparel products both from Japanese makers and from abroad, is expected to grow in the future.

European and American imports retain their positioning in the Japanese market as luxury name-brand items, and imports from these countries are not likely to experience major quantitative growth. Imports from other Asian countries, on the other hand, are likely to make significant inroads into the Japanese market, as their steadily improving product quality and design properties combine with low prices to pose ever stiffer competition against products made in Japan.

## 7. Domestic Distribution System and Business Practices

### (1) Domestic Market Conditions

The Japanese market for silk apparel has shown a downward trend in demand since the bubble economy ended in 1991, after steady growth over a decade or so. Regarding women's wear, dresses, skirts and other types of outerwear have enjoyed great popularity of late. Demand remains strong for silk casual wear, including T-shirts, tank tops, blouses and skirts. Demand for silk men's wear remains concentrated in the area of suits and other heavyweight outerwear. Men's silk inner apparel has experienced only very slight growth.

In geographic terms, the purchasing of silk apparel is disproportionately concentrated in the Tokyo area, the Osaka-Kyoto-Kobe area, and other major metropolitan areas, mainly because in the big cities consumers are more fashion-conscious and purchasing cycles are shorter. At the retail stage, department stores and other large retail stores have posted significant sales growth, while smaller retail stores have experienced flat or even falling sales.

Silk generally are more expensive and more difficult to wash and care for than cotton, linen or synthetic fabrics. Accordingly, it is difficult to envision any more spectacular growth in the silk apparel market. Nevertheless, Japanese consumers still purchase fewer silk garments than countries in the West, and the persistent consumer preference in Japan for real rather than chemical fiber products bodes well for continued moderate growth in the Japanese silk apparel market.

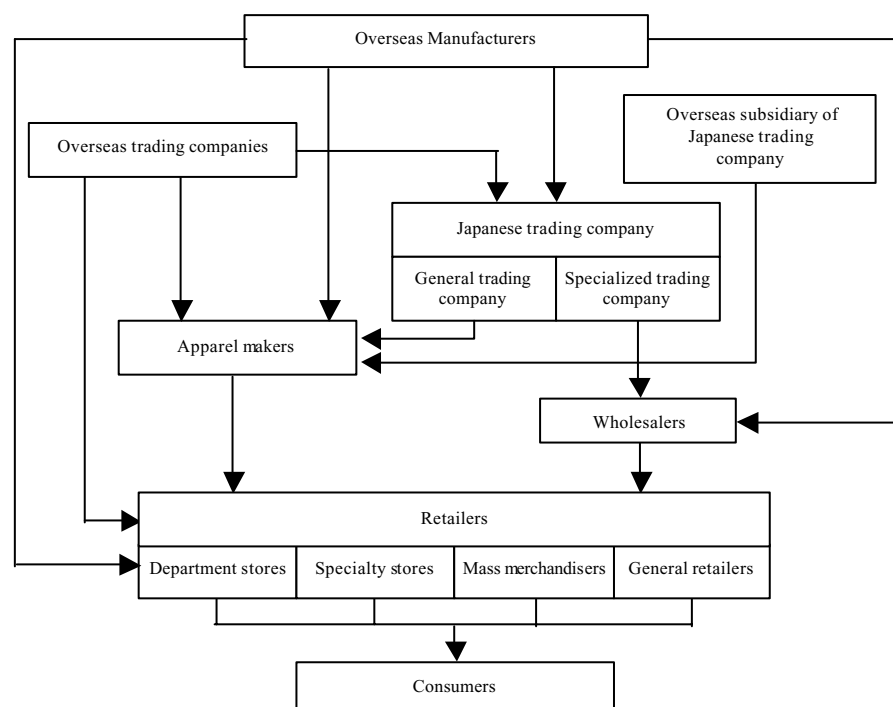
### (2) Distribution Channels

Because most imports consist of ready-to-wear merchandise, imports most commonly pass from the overseas manufacturer to a Japanese general trading company or specialty trading company, then to a wholesaler, and finally to retailers for sale to consumers. Sometimes larger wholesalers, department stores or mass merchandisers have direct purchase agreements with overseas manufacturers.

Purchasing of imported silk apparel tends to be seasonal. Most buyers order for the spring-summer season and again for the fall-winter season. Buyers sometimes travel directly overseas looking for merchandise. Sometimes purchases are made through officials of a Japanese-owned subsidiary in other countries/regions, and sometimes buyers conduct negotiations with overseas suppliers by telephone or from Japan. In addition, more and more overseas apparel makers are sending sales reps to Japan to identify prospects and make sales.

Recently there has been an increase in the sale of silk apparel by mail order in Japan. Mail order companies often have direct tie-ins with apparel makers in China or other countries/regions in Asia.

**Fig. 4** Distribution channels for silk apparel products



### (3) Key Considerations for entering the Japanese Market

The Japanese apparel market is fully matured, and low prices alone do not necessarily lead to sales. Some sort of clear-cut brand identity has to be established. But any maker who can offer Japanese consumers what they are looking for in terms of materials, technology and design will be accepted in the Japanese market and will fare well against competitors. This is just as true for silk apparel as for any other product. Prospective importers need to be aware of the following considerations:

- Delivery

Some measure of care is required when importing seasonal merchandise and fashion goods from distant places with different seasons. It can take a long time to acquire materials and accessory items and to transport them both to the production site and then to Japan. Sometimes it happens that merchandise reaches Japan only after the peak sales season for that item has already passed. Overseas suppliers in some cases do not appear to place as much importance as they should on prompt order fulfillment.

- Production lots

Because historically the production of apparel for export has been oriented toward the needs of the European or American markets, production lots have typically been very large. They often conflict with the needs of the Japanese market, where small-lot production runs, multiple product types and short production cycles are more the norm. Prospective importers need to identify suppliers who can adapt to these kinds of production requirements.

- Quality standards

Sometimes merchandise passes quality inspection in the country of origin only to fail quality inspection in Japan. Western quality standards place more emphasis on external appearance rather than the fine points of workmanship. However, Japanese consumers tend to be perfectionists, and they are sometimes very finicky about workmanship (such as weaving imperfections in the fabric or problems with stitching) even when it does not affect the usefulness or functionality of the product.

## 8. After-Sales Service

Most any retail store can perform minor forms of after-sales service such as adjusting the fit or taking up the cuff or hemline. However, since cleaning can cause problems with silk products, consumers need to be made aware of the proper care instructions through labeling.

## 9. Related Product Categories

As is the case with silk apparel products covered by this guidebook, silk handkerchiefs, scarves and neckties are not subject to any legal regulation at the time of import. However, silk yarn, silk fabric, silk bed linens and Japanese-style accessory items made from silk are sometimes subject to import approval and prior confirmation requirements of the Import Trade Control Order. In addition, imports of silk fabrics from certain countries of origin require import approval. For more information, please contact the Trade Licensing Division, Trade and Economic Cooperation Bureau, Ministry of Economy, Trade and Industry.

## 10. Direct Imports by Individuals

There are no restrictions on direct imports by individuals. However, individuals are advised to make sure the silk apparel products involved are right for their personal body size and type before making the purchase, since other countries use different size and other labeling practices than Japan.

## 11. Related Organizations

- The Japan Textiles Importers Association      TEL: 03-3270-0791
- The Japan Silk Association, Inc.              TEL: 03-3215-1212      <http://ns1.silk-center.or.jp>