



Federation of the European  
Sporting Goods Industry

FESI Position Paper

# COMMENTS ON PROPOSED EU COUNTER- MEASURES

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June 2025

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The Federation of the European Sporting Goods Industry (FESI) welcomes the opportunity to contribute to the European Commission's consultation on potential EU countermeasures in the context of the ongoing dispute with the United States. The sporting goods sector is a key part of the global economy, relying on complex international supply chains. We thank the European Commission for considering our industry's perspective as part of this important process and urge the adoption of a balanced and proportionate response.

FESI regrets to see that a wide range of sporting goods equipment - specifically items classified under Chapter 95 - has been included in the list of products that could be subject to EU countermeasures. These products are essential for the operation of our sector, which is largely composed of small and medium-sized enterprises (SMEs). Imposing tariffs on such equipment would risk disproportionately harming a sector that represents over 700,000 jobs in the EU and contributes €81 billion in annual turnover.

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## 1. EU- U.S. trade in sporting goods: a clear surplus in Europe's favor

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The trade of sporting goods equipment between the EU and the U.S., while modest in volume compared to other sectors, is highly significant for the businesses involved - particularly SMEs. Most importantly, the EU maintains a clear and substantial **trade surplus** in this segment.

To illustrate this, we draw particular attention to **skis (HS Code 950611)**, where the EU exported **€138 million** worth of products to the U.S. in 2023, compared to imports of only **€4 million**. This reflects a **32:1 trade ratio**, meaning that for every €1 of ski equipment imported from the U.S., the EU exports €32 back.

Other key examples of this surplus include:

- **Ice and roller skates (950670):**
  - EU exports: **€5.6 million** | EU imports: **€2.7 million**
- **Table tennis equipment (950639):**
  - EU exports: **€3.6 million** | EU imports: **€0.16 million**
- **Badminton and similar rackets (950659):**
  - EU exports: **€1.7 million** | EU imports: **€0.3 million**
- **Tennis rackets (950651):**
  - EU exports: **€1.6 million** | EU imports: **€0.3 million**

These figures demonstrate that the EU consistently exports **multiple times more** than it imports in nearly all relevant sporting goods categories.

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## **2. Call for the removal of sporting goods from the list**

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In light of the above, FESI kindly and respectfully requests the removal of all sporting goods equipment from the draft list of potential EU countermeasures. Our position is grounded in the following key arguments:

### **a. Limited trade impact**

Sporting goods represent a small portion of overall EU–U.S. trade. Including these products in the countermeasures would not meaningfully increase pressure on the U.S. but would have an outsized negative impact on a vital European sector.

### **b. Disproportionate harm to SMEs**

The vast majority of companies in our industry are SMEs. They lack the financial resilience and flexibility to reconfigure their supply chains in response to sudden trade barriers. New tariffs would create substantial disruption and threaten jobs and businesses across the EU.

### **c. Risk of retaliation and damage to EU trade surplus**

Given the EU's strong export position, including these products in the countermeasures could prompt retaliatory measures from the U.S. This would directly jeopardize the EU's significant trade surplus and undermine the competitiveness of European companies.

While we fully understand the exceptional nature of the current geopolitical and trade context, we urge the European Commission to pursue a proportionate, strategically focused response that avoids collateral damage to sectors such as ours. We remain strongly committed to rule-based trade and hope for a swift, negotiated resolution that reinforces transatlantic economic cooperation.

The sporting goods industry stands ready to support the European Commission in identifying constructive, proportionate solutions and remains available for continued dialogue throughout this process.