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*Vice President,
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October 17, 2025

Mr. Stephen Astle
Director, Office of Strategic Industries and
Economic Security
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Re: BIS Docket No. 2025-0257 and XRIN 0694-XC138: Notice of Request for Public
Comment on Section 232 National Security Investigation of Imports of Robotics
and Industrial Machinery

Dear Mr. Astle:

The National Association of Manufacturers is the voice of the manufacturing community and the leading advocate for a policy agenda that supports and empowers the 13 million people who make things in America. As the largest manufacturing association in the U.S., the NAM's membership includes businesses of all sizes, across all industrial sectors, and in all 50 states. Manufacturers collectively contribute \$2.93 trillion to the U.S. economy and account for nearly 53% of all private-sector research in the nation.¹

The Administration has rightly pursued a comprehensive manufacturing strategy. Implementing the President's tax reforms, unblocking permitting approvals, rebalancing regulations, and making investments in the American manufacturing workforce are all vital to achieving a renaissance in American manufacturing.

The NAM appreciates the opportunity to comment on the Department of Commerce investigation under Section 232 of the Trade Expansion Act of 1962 to determine the effects on the national security of imports of robotics and industrial machinery.

Simply put, robotics and industrial machinery make all other manufacturing possible.

Increasing the uptake and usage of robotics and industrial machinery drives productivity gains and innovation across the entire manufacturing base including manufacturing for defense applications, and in turn will generate more demand for domestic production of that machinery. Today, capacity utilization is around 80% for domestic machinery production in the U.S. If domestic machinery production were running at 100% of capacity utilization, production in the U.S. could only meet 55% of today's demand.² If tomorrow we doubled U.S. machinery

¹ National Association of Manufacturers (May 2025), Manufacturing in the United States, <https://nam.org/mfgdata/#KeyFacts>

² Estimate derived from Bureau of Economic Analysis (BEA) 2024 *Domestic Supply and Use of Commodities* data for machinery, combined with Federal Reserve industrial capacity utilization statistics. In 2024, domestic supply of

production capacity—an expansion requiring years of sustained investment—we could only meet today’s demand levels. Tariffs would raise near-term costs without addressing these underlying capacity constraints.

Much of the highly specialized machinery and advanced robotics that are increasingly in demand in America’s factories is not produced domestically at all. Neither are the specialized parts and components needed to produce, maintain and repair them in the U.S. Manufacturers rely on nearly \$297 billion in imported machinery, predominantly from allied trading partners with whom the U.S. has trade agreements or is currently negotiating trade agreements.

U.S. tariffs on these critical manufacturing inputs are historically low (1.5%) to enable and sustain manufacturing advantage. Additional tariffs on this machinery would significantly increase the cost of installing more equipment and machinery on each and every factory floor in America, reducing or delaying investment in new plants and equipment at a time when manufacturers want to ramp up U.S. manufacturing investment and output, and create more jobs through the Administration’s comprehensive, pro-manufacturing agenda.

Simply put, manufacturers can’t grow and compete if they can’t afford the machinery they need to operate. Tariffs disincentivize investment today and drive up the cost of expanding production in all forms, from parts and components to large machinery to advanced robotics. Below are the NAM’s recommendations for how to use trade policy to promote manufacturing growth.

Investing in the Nation’s Manufacturing Productivity

Industrial machinery is the bedrock of a modern manufacturing facility, instrumental throughout the entire production cycle from managing input inventories to performing tasks on production lines to moving finished goods out of the factory and throughout warehouses. Machines weld, press, extrude, assemble, paint and package. Forklift trucks, excavators, loaders and cranes are ubiquitous to break ground and expand. Depending upon the scope of this investigation, new tariffs could impact approximately a half trillion dollars of imports per year of machinery affecting every factory in America, small and large.

Manufacturers making investments in machines and equipment for their operations must make a holistic business case for these long-term, often large-scale investments. With margins under pressure, they need to be confident these investments will pay back through improvements in productivity, throughput and quality. Manufacturers also need predictability with respect to their cost assumptions associated with large capital expenditures for machinery and robotics. While expansions and new builds offer opportunities to deploy more automation, America’s factories are also undergoing upgrades to alleviate process bottlenecks, achieve greater customization, increase quality, and protect the health and safety of workers. Tariffs discourage the deployment of these productivity-inducing investments and inhibit expansion.

Manufacturing equipment and machinery are capital-intensive, designed for long-term use within manufacturing facilities, typically operating over 10- to 20-year life cycles. According to NAM members, imported machinery is specialized for precision applications. Companies have

machinery totaled \$419.2 billion, while total domestic use reached \$958.6 billion. Given current utilization of roughly 80%, operating at full capacity (100%) would yield supply of about \$524 billion, sufficient to meet only 55% of current domestic demand.

worked with their suppliers to ensure this capital equipment meets their exact standards and is tailored to their production needs, including to meet quality and safety standards. These company requirements are often standardized across their global operations. Furthermore, orders for capital equipment have been placed at certain prices; a tariff increase will have an immediate impact on small businesses that have not planned for those new expenses.

Domestic production of industrial machinery and robotics is currently insufficient, and in many cases unavailable, to meet growing demand. Manufacturers in the U.S. therefore import a wide variety of industrial machinery - from machine tools for metalworking (such as punches, laser cutters, and drills, as well as other equipment for shaping and finishing materials), to robotics for automating manufacturing processes, to construction machinery for breaking ground on manufacturing projects, as well as equipment for electrical power generation and machines used to package many manufactured products. Machinery for farming and food production is another significant import category.

At the same time, the production of industrial machinery and robotics that is U.S.-based often relies to a great extent on parts and components not available domestically. For manufacturers seeking to repair, maintain and upgrade their existing industrial machinery and robotics infrastructure, they rely on the importation of parts and components that are compatible with their installed industrial machinery and robotics.

Disrupting access to these inputs, including by rendering their importation cost prohibitive, would weaken manufacturers' ability to produce critical goods, including those essential to public services such as defense, infrastructure, and energy, and could jeopardize access to imported products that are critical for maintenance and operational continuity.

Robotics Installations as a Leading Indicator of Competitiveness

NAM members include the world's largest and leading industrial robotics companies. As a sub-category of industrial machinery, robotics installations are a leading indicator of global manufacturing competitiveness. Just over 542,000 robots were installed in factories worldwide in 2024.³ The electronics sector accounted for 24% of installations, automotive 23%, metal and machinery 16%, followed by the plastic and chemical products industry at 5% and the food and beverage industry at 4%. Notably, producers of metal products and producers of industrial machinery have increased usage of robots substantially over recent years, with installations up 16% to a new peak level in 2024.⁴ The life sciences industry represents a significant growth area for automation.

But while Asia experiences growth, American installations are in decline. Nearly three-quarters of global installations were in factories in Asia. China alone accounted for over 276,000 new installations versus 37,587 robots in the U.S. India's growth rate was nearly 60%, the UK over 50%, and Canada nearly 40%. In contrast, the U.S. contracted by 5%. The U.S. still ranks only tenth globally in robot density, underscoring ample headroom for automation.

By 2028, annual installations are predicted to surpass the 700,000-unit mark. Now is the time to close the gap and drive uptake by companies that seek further automation, including among small- and medium-size manufacturers who may require additional knowledge, technical

³ *World Robotics 2025 – Industrial Robots*, International Federation of Robotics Statistical Department, VDMA Services GmbH, Frankfurt am Main, Germany, 2025.

⁴ Ibid.

expertise and capital resources to keep pace. Today, over 80% of robots sold in the U.S. are manufactured abroad. Imposing new tariffs would stymie the upward trend of adoption by making these technologies more expensive. Increasing uptake is also the way to stimulate demand to increase domestic production of specialized parts and components such as high-precision robotic gearboxes, advanced servomotors, and certain electronics, as well as production of more finished robots in the U.S.

Domestic Policies to Increase Production and Usage of Industrial Machinery and Robotics in Manufacturing in the U.S.

Tax Policy: Manufacturers have long championed the efforts of Congress and the Administration to develop and implement competitive, pro-growth tax policy. Tax reforms included in the Tax Cuts and Jobs Act (TCJA), first taking effect in 2018, led to significant capital investment, job creation, and wage growth across our industry. In 2018, capital spending increased 4.5% and by 5.7% in 2019.⁵

The One Big Beautiful Bill Act (OBBBA) was a historic achievement that built on the success of TCJA, making permanent a tax code that drives manufacturing investment and adapts to the increasingly competitive global economy. The OBBBA **expansion of immediate expensing to qualified production facilities** that begin construction after January 19, 2025, before January 1, 2029, and placed in service before January 1, 2031, will incentivize and support investments in advanced technologies throughout the manufacturing economy.

Equipping an existing manufacturing facility with these advanced technologies often requires substantial improvements to the infrastructure of the facility itself, such as to the facility's electrical systems, as well as investments in maintenance. Combined with R&D provisions, the Administration's tax policy for expensing will **stimulate demand for both domestic and imported industrial machinery, parts and components to stand up, operate and upgrade manufacturing facilities.**

It is counterproductive to impose a tax in the form of a tariff on the machinery every manufacturer in the U.S. needs for new construction and installation and to upgrade and maintain the type of machinery, parts and components that every factory in America already deploys. Raising the costs of this machinery and equipment will delay, reduce or deter these investments. Keeping the MFN tariff or negotiating reciprocal zero-for-zero trade deals will enable tax reforms to accelerate these investments – and maintain global advantage.

Permitting Reform: The Administration has taken important action to streamline permitting, including working to correctly implement the Fiscal Responsibility Act's NEPA reforms to appropriately limit the scope of NEPA reviews. Manufacturers still need comprehensive, bipartisan permitting reform legislation to fully unlock all sources of American energy and manufacturing dominance. These reforms would work hand in glove with tax policy to stimulate investments leading to expanded deployment of the types of machinery and special industrial equipment potentially included in the scope of this investigation.

⁵ U.S. Census Bureau, Annual Survey of Capital Expenditures, Table 2A, Manufacturing; U.S. Census Bureau, Annual Survey of Capital Expenditures, Table 2A, Manufacturing.

Workforce Development: The U.S. has long faced a structural workforce shortage. According to a 2024 landmark study by the Manufacturing Institute (MI), the 501(c)3 nonprofit workforce development and education affiliate of the NAM, in partnership with Deloitte, the U.S. manufacturing sector will face 3.8 million job openings by 2033, with more than half potentially going unfilled without urgent reforms to talent development systems. President Trump's Executive Order 14278 calls for a bold modernization of the federal workforce system and expansion of employer-led apprenticeship opportunities, an approach long championed by the MI as manufacturers across the country—small and large, urban and rural, across a range of sectors—continue to face an expanding applicant and skills gap that threatens to slow innovation and economic progress.

While finding skilled workers is a challenge across U.S. manufacturing, the problem is particularly acute for companies making robotics and industrial machinery. Robotics manufacturing is a highly sophisticated process that requires a well-trained workforce.⁶ The U.S. can neither increase domestic production of robotics and industrial machinery nor deploy the most advanced machinery in factories without more investments in training, upskilling, and filling the talent pipeline. Successful training programs train their students on the most common industrial machinery and robotics platforms. Tariffs on this equipment pose unnecessary challenges to those seeking to build a stronger U.S. workforce.

Time and again, it has been demonstrated that deploying technology in manufacturing facilities increases overall employment.⁷ The process knowledge accrued by these workers drives further innovation on the factory floor. The Administration's AI Action Plan also rightly recognizes the manufacturing workforce must have the necessary skills to leverage AI. As AI becomes a national priority, long-term success in manufacturing hinges on how well we prepare our workers to integrate it.

The Machinery That Makes Manufacturing in the U.S. Possible

Industrial machinery and robotics are ubiquitous and essential in American manufacturing from large to small facilities, and in every sector from automotive to energy distribution, to life sciences and food and beverage production. Below are just a few examples of how they are utilized and the role imports play in manufacturing in the U.S.

Automotive

Automation has deep roots in the automotive industry as an early adopter of industrial robots and sensor technology in assembly plants and today remains at the forefront of advancements in automation. The automotive industry has the highest numbers of installed industrial robots worldwide, performing tasks at nearly every stage of vehicle production. Robots, motion control and vision systems, artificial intelligence (AI), and other automation technologies work together to complete various tasks, from welding and assembly to inspection and testing. These industrial machines relieve workers of the ergonomic strain of certain manual and repetitive processes or provide efficient delivery of materials across the factory floor. During the battery manufacturing process for example, automation enables key tasks such as electrode

⁶ *Preparing the Advanced Manufacturing Workforce: A Study of Occupation and Skills Demand in the Advanced Robotics Industry* by Elizabeth Moore, Frank Field, Richard Roth, Randolph Kirchain, August 2021 accessed at <https://cam.masstech.org>.

⁷ <https://itif.org/publications/2025/07/18/time-to-act-policies-to-strengthen-us-robotics-industry/>

production, cell assembly, and electrolyte filling to be performed with extreme precision. Robotic arms are used during the battery pack assembly process to ensure consistency and safety.

NAM's automotive industry members report that while certain general-purpose materials handling systems can be sourced domestically, much of the advanced precision machinery for functions including metal forming, body assembly, painting and powertrain integration, among others, is not available in adequate supply or solely from U.S. suppliers today.

For example, paint shops combine robotics, process equipment, and environmental systems in highly synchronized operation. They may incorporate critical components from Japan which are integrated with process lines engineered by suppliers in Germany and the U.S. These facilities depend on specialized booths, HVAC, and chemical-mixing systems with components sourced globally. Differing tariffs on multiple sources within the same supplier network is likely to disrupt existing, reliable import flows of industrial machinery not only for the OEMs in the U.S., but also for the U.S. suppliers who participate in the sub-segments of the supply chain. There is often no domestic substitute and a substitute could not be developed quickly to company specifications.

Aluminum

As aluminum producers in the U.S. work to expand capacity, they require installations of aluminum extrusion presses. These presses are constructed from large, forged steel components manufactured in Germany and Italy because domestic mills and forging presses capable of producing components of the required size are absent domestically. Similarly, there are no domestic sources of downstream handling equipment. The presses and other machinery, which must be imported, and which run in the hundreds of millions, is already subject to high IEEPA and Section 232 metal tariffs, putting expansion plans at risk. In turn, the inability to expand aluminum production due to prohibitive costs means these producers' customers – the aluminum end users in the manufacturing community – will remain dependent on higher cost imports to get the supplies they need for their own operations.

Mining

Underground hard rock mining depends on advanced specialty equipment that enables autonomous and remote operations. This state-of-the-art technology is today exclusively manufactured in Nordic countries, with no domestic alternatives available. Additional tariffs on these essential imports for greenfield mining projects that require billions of dollars of capital investment works at cross-purposes as the U.S. works to expand domestic mining critical for national security.

Life Sciences

Life sciences manufacturers in the U.S. deploy robotics and industrial machinery throughout the production process. High-end industrial equipment performs tasks from the lab to building medical devices to packaging. They ensure products are contamination-free, maintaining a sterile environment to meet stringent safety and quality standards. Tariffs on the machinery that helps make our medicines and medical devices safer are counterproductive to goals to further increase production in the U.S. while reducing health care costs.

Semiconductors and Next Generation AI Factories

The Administration has rightly connected AI leadership to bringing advanced semiconductor manufacturing capacity to the United States. The modern semiconductor manufacturing process relies on high-precision robotics and industrial machinery across the value chain, including for wafer handling, material transport, front-end and back-end fabrication, and packaging. Relatedly, industrial machinery used for metrology, inspection, and testing are critical inputs in the manufacturing process, as are a wide range of other goods to support cleanroom and utility systems, sensors, and controls. While some of these industrial machines are made in the U.S., many are imported from allied trading partners and are necessary complements to their American-made counterparts. Imposing broad tariffs on these imports could increase capital costs, delay investments, and ultimately undermine the Administration's successes in restoring domestic semiconductor manufacturing capacity.

Energy

Robotics and industrial equipment are essential to the U.S. energy sector from exploration to refining to petrochemical production, including its use on drilling rigs, in robotic subsea operations and inspections, for pipeline operations and storage, in refining and petrochemical finishing operations, and in packaging plants. Increasing tariff costs as companies are investing in projects in the U.S. is counterproductive to the goal of U.S. energy dominance.

Satellites

Robotics and automation solutions are prevalent in satellite manufacturing operations. Solar arrays are produced on an automated line, components are placed on the satellite using robotic arms, special coatings are sprayed using robotic arms, and satellites are manipulated during production and loading at the launch sites using semi-automated equipment. The use of robotics is driven by safety – to remove people from operations that use chemicals and ergonomic repetitive stress syndrome, for example. It is also driven by quality, such as for the precision location and placement of components. It also increases productivity: using a coordinate measuring machine rather than manual metrology solution, for example, reduces the task time from 1.5 hours to 9 minutes. Increasing the cost of these technologies for commercial and defense purposes runs counter to U.S. national security interests.

Limited, Low and Singular Tariffs with Delayed Implementation

According to the International Trade Commission, U.S. imports of machinery totaled \$256.5 billion in 2024.⁸ Mexico, Germany, Japan, Canada, and Italy are top sources. Industry machinery producers in these countries are longstanding suppliers committed to delivering specialized machinery to meet the exacting requirements of manufacturers in the U.S. For example, almost 65% of robotics imports come from Japan, Germany, and South Korea and Mexico contributes another 5.6%. Imports from China are only 4.2% of total robotics imports to the United States, or \$29.7 million in 2024.⁹

⁸ https://www.usitc.gov/research_and_analysis/tradeshifts/2024/machinery data derived from USITC DataWeb/Census accessed June 30, 2025, with household appliances subtracted from the HS machinery category.

⁹ <https://itif.org/publications/2025/07/18/time-to-act-policies-to-strengthen-us-robotics-industry/>

For non-USMCA qualifying goods, the average U.S. MFN tariff rate on imported machinery is less than 1.5% to ensure the affordability of foundational machinery used on every factory floor in the U.S. for its operations and productivity. **At a minimum, we should maintain this low MFN rate.**

To the extent the Department recommends tariffs on robotics and industrial machinery, no Section 232 tariff should be applied to USMCA qualifying goods. Any Section 232 tariff **should not stack** on MFN, other sectoral 232 tariffs, IEEPA or any other tariffs.

Manufacturers considering investments in U.S. manufacturing facilities require a stable investment environment with predictable equipment costs. Uncertainties surrounding tariff policies significantly impact manufacturers' ability to commit to long-term capital investments, leading manufacturers in the U.S. to reconsider or halt planned investments.¹⁰ Regional manufacturing surveys, notably the Richmond regional survey, reported negative investment forecasts.¹¹ In the [NAM's Q3 2025 Manufacturer's Outlook Survey](#), manufacturers projected capital investments would increase just 1% over the next 12 months.

Much of this uncertainty stems from potentially compounding U.S. tariffs and new port fees. In addition to IEEPA tariffs, multiple Section 232 investigations already have significant bearing on production in manufacturing industries. The steel and aluminum Section 232 tariffs, for instance, currently apply not just to primary metal imports, but broadly to derivative products containing these metals. Robotics and industrial machinery contain significant amounts of these metals. Many are currently under consideration for inclusion in the steel and aluminum derivative products list.

As the Administration's April 29, 2025 executive order regarding the "unstacking" of automotive-related Section 232 tariffs recognizes, tariff complexity has negative consequences for manufacturers who cannot predict the level of tariffs on essential imports required for the construction and operation of their facilities in the U.S.¹² This long-term unpredictability gravely undermines manufacturers' ability to plan effectively, thereby significantly harming investment prospects in the U.S.

Example of Compounding Tariff Impacts on Critical Industrial Machinery Imports

All of the machines being used to make paper and pulp products here in the U.S. are made abroad, mainly in Europe. These machines are tens of millions each. NAM members report that if subject to an IEEPA tariff of 15% in addition to section 232 tariff, investment in new capital equipment to improve existing and build new facilities for paper and packaging production in the U.S., will become cost prohibitive.

¹⁰ Federal Reserve Bank of New York (April 2025), Empire State Manufacturing Survey, https://www.newyorkfed.org/medialibrary/media/Survey/Empire/empire2025/ESMS_2025_04.pdf?sc_lang=en&hash=03E17019AE59F42ABC7492D9678DFDE2; Federal Reserve Bank of Philadelphia (April 2025), Manufacturing Business Outlook Survey, https://www.philadelphiafed.org/-/media/FRBP/Assets/Surveys-And-Data/MBOS/2025/bos0425.pdf?sc_lang=en&hash=A1CF2F346929B0806D5B75EAD232F26B

¹¹ Regional Reserve Bank of Richmond (April 2025), Fifth District Survey of Manufacturing Activity, https://www.richmondfed.org/~/media/RichmondFedOrg/region_communities/regional_data_analysis/regional_economy/surveys_of_business_conditions/manufacturing/2025/pdf/mfg_04_22_25.pdf

¹² The White House (April 29, 2025), Addressing Certain Tariffs on Imported Articles, <https://www.whitehouse.gov/presidential-actions/2025/04/addressing-certain-tariffs-on-imported-articles/>

HTS code	Description	Higher Tariff Rates
8441.90	Parts of machinery for making up paper pulp, paper or paperboard, including cutting machines of all kinds.	EU or Japan IEEPA rate = 15% versus MFN Note that 8441.10 and 8441.80 are set to zero for aerospace manufacturing but not for other manufacturing applications
8441.30	Machines for making cartons, boxes, cases, tubes, drums, or similar containers from paper pulp, paper, or paperboard, excluding those that create containers through molding	
8441.10	"Other machinery for making up paper pulp, paper or paperboard	
8441.80	cutting machines for paper, paperboard, or paper pulp	
8441.90	Parts of machinery for making up paper pulp, paper or paperboard, including cutting machines of all kinds.	15% IEEPA tariff plus/or potential 50% if added to steel and aluminum derivative list – pending decision by DOC
8439.30	Machinery for finishing paper or paperboard	

Orders Made but Not Delivered

Orders for most industrial machinery are made at least one year before taking delivery. Any new Section 232 tariffs should not be applied to orders made for equipment to be installed within the next 12 to 18 months. Additionally, goods that entered an FTZ prior to any Section 232 tariff should not incur a Section 232 tariff when removed from the FTZ.

Machinery Imported for Recalibration or Repair

Machinery produced in the U.S. for sale or deployment in plants anywhere in the world may be imported back to the U.S. for recalibration or repair in U.S. factories by U.S. workers that hold the technical expertise and where intellectual property rights are protected. The machinery is then re-exported for reinstallation. These imports should not be subject to Section 232 tariffs.

Sectoral Deals with Key Trading Partners

U.S. industrial machinery exports in 2024 were \$163.8 billion, comprising a wide range of machinery and equipment including electric motors, semiconductor manufacturing equipment, farm equipment, centrifuges and purifying equipment, industrial thermal processing equipment, mineral processing equipment, metal cutting and forming machine tools, packaging and can-sealing machinery, pulp and paper machinery, welding and soldering equipment and textile machinery.

Nearly 30% of U.S. industrial machinery exports were sold to Mexico and Canada. Other top export destinations include South Korea, Taiwan, Japan and Germany.¹³ These are countries with which the U.S. either has a tariff-free trade agreement or with which the U.S. is currently

¹³ https://www.usitc.gov/research_and_analysis/tradeshifts/2024/machinery

negotiating trade deals. NAM recommends **finalizing deals with these trading partners to secure terms on which to promote U.S. manufacturing export growth.**

The NAM continues to advocate for zero-for-zero tariff deals with allied trading partners. For those countries with which the U.S. does not have free trade agreements, the weighted average MFN for machinery is 6.24%.¹⁴ For capital goods it's nearly 4%. Zero-for-zero deals would ensure access to what we need to accelerate investments across manufacturing in the U.S. Importantly, these deals would also **lock in preferential market access for future U.S. exports.**

Given the large proportion of intra-industry trade in robotics and industrial machinery with allied trading partners, deepening these relationships on a mutually beneficial basis is in the national security interests and would enable the U.S. to develop approaches to preserving the integrity of the embedded information and data systems native to advanced manufacturing equipment.

Address Unfair Trade Practices

It has been a decade since central planners in Beijing issued Made in China 2025. China's state-directed industrial strategy targets the development and growth of an ecosystem to support production of robotics and industrial automation, among other technologies. Industrial targeting serves not only to drive self-sufficiency but to achieve global dominance. State-owned enterprises receive direct subsidies, tax breaks, low-interest loans and other forms of government-backed or directed financing.

Furthermore, although tariffs on China may act to counterbalance some unfair practices, they are not sufficient to more directly combat systemic, non-market practices and behaviors that continue unabated to generate overcapacity and distort global markets in key manufacturing sectors. The NAM seeks to work with the Administration on more effective approaches to discipline the non-market practices of state-owned enterprises.

U.S. Manufacturing Investment Accelerator: Speed Pass for Industrial Machinery and Robotics

It is axiomatic that companies purchasing robotics and industrial machinery are investing in U.S. production. They are either making new investments or are making improvements to existing investments. Expansion in both forms is a shared goal between NAM members and the Administration and is a centerpiece of the Administration's policies. Manufacturers should be supported and incentivized toward these activities.

The NAM has proposed the Administration further accelerate U.S. manufacturing investments through issuance of general licenses – or a “[manufacturing speed pass](#)” to any company importing robotics and industrial machinery, and related parts and components, **for further manufacturing activity in the U.S.** along with other industrial resources not available in sufficient quantities in the U.S.

¹⁴ World Integrated Trade Solution, <https://wits.worldbank.org/>

Conclusion

The NAM appreciates the opportunity to comment on this important investigation. We respectfully suggest that three weeks for public comment does not provide our members with meaningful or adequate opportunity to compile input necessary to fully inform the Department's investigation. Accordingly, we encourage the Department to engage the industry and solicit more data, stories and information over the coming weeks about manufacturing and the machinery that makes it run. **The NAM would be pleased to host roundtables or otherwise assist in the Department's efforts to compile a full picture of the role that machinery and robotics play in the manufacturing landscape.**

The strength and the vibrancy of the U.S. economy depend on the competitiveness of U.S. manufacturing. Every job in manufacturing creates four others. Every dollar invested in our sector adds more than two and a half dollars to the broader economy. More than half of all private-sector research and development in the United States happens on the factory floor.

And if U.S. manufacturing were a nation unto itself, it would rank as the eighth-largest economy in the world. When we invest in the dynamic, innovative and indispensable U.S. manufacturing economy, we invest in the preeminence of the United States and the security of its citizens.

Manufacturers need certainty to make long-term, competitive investment decisions and trade policies that lower, not raise, the cost of doing business in the U.S. Trade policy should correct for an unlevel playing field, but empower mutually beneficial trade with allies that deliver high-quality industrial capital goods and inputs we need to build more in the U.S. and sell more in the world. That's how, together, we will secure the next decade of American industrial leadership.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrea Durkin", with a stylized flourish at the end.

Andrea Durkin
Vice President, International Policy