

August 12, 2026

The Honorable Howard Lutnick
Secretary
U.S. Department of Commerce
1401 Constitution Ave. NW 20230

Jeffrey Kessler
Undersecretary for Industry and Security
U.S. Department of Commerce
1401 Constitution Ave. NW 2023

Secretary Lutnick and Undersecretary Kessler,

On behalf of the undersigned state associations representing the U.S. forest products value chain, including pulp and paper manufacturers, wood products manufacturers, and forest owners, we write regarding the ongoing Section 232 investigation into imports of industrial machinery and robotics. Collectively, our sector supports more than 3.9 million American jobs, the vast majority located in rural communities across the country.

Our industry relies on a wide range of highly specialized industrial machinery and advanced robotics to manage and harvest timber and to manufacture pulp, paper, and wood products. These technologies are essential to maintaining efficient, modern, and globally competitive U.S. operations.

While our members consistently prioritize sourcing equipment and components domestically wherever possible, U.S.-based manufacturers are not currently able to meet the full scope or scale of demand for this specialized equipment. As a result, access to globally sourced machinery and robotics remains critical to continued investment in U.S. facilities.

For these reasons, we respectfully urge the Department to ensure that the Section 232 investigation preserves U.S. manufacturers' access to essential industrial machinery that is not available, or not available at sufficient scale, domestically. In particular, we encourage the Department to avoid imposing tariffs on these inputs, or to maintain them at the lowest possible levels, to prevent unintended widescale increases in production costs.

Maintaining reliable access to these technologies will support ongoing capital investment, mill modernization, and the long-term competitiveness of the U.S. forest products sector. It will also provide the certainty needed to sustain and grow high-quality manufacturing jobs in rural communities nationwide.

We appreciate your continued engagement with our industry and stand ready to serve as a resource as this process moves forward.

Sincerely,

Alabama Forestry Association
Allegheny Hardwood Utilization
Group
American Forest & Paper
Association
American Wood Council
Arkansas Forestry Association
Association of Consulting
Foresters
Composite Panel Association
Forest Resources Association

Hardwood Federation
Hardwood Manufacturers
Association
Lake States Lumber Association
Louisiana Forestry Association
Louisiana Logging Council
Maine Forest Products Council
Michigan Forest Association
North Carolina Forestry
Association

National Alliance of Forest
Owners
Ohio Forestry Association
Oregon Women In Timber
Penn-York Lumbermen's Club
Southern Forest Products
Association
Tennessee Forestry Association
Treated Wood Council
West Virginia Forestry
Association