



NATIONAL STONE, SAND
& GRAVEL ASSOCIATION

May 18, 2026

The Honorable Jamieson Greer
United States Trade Representative
Office of the United States Trade Representative
The Winder Building
600 17th Street NW
Washington, DC 20508

Request for Comments on the Section 301 Investigations of Acts, Policies, and Practices of Certain Economies Relating to Structural Excess Capacity and Production in Manufacturing Sectors

Dear Ambassador Greer:

The National Stone, Sand & Gravel Association (NSSGA) appreciates the opportunity to comment on the U.S. Trade Representative's (USTR) Request for Comments in Docket No. USTR-2026-0067 regarding Section 301 investigations into structural excess capacity and production in manufacturing sectors.

NSSGA members include stone, sand and gravel producers; industrial sand suppliers; and equipment manufacturers and service providers who support them. With over 9,000 locations, the aggregates industry produces about 2.5 billion tons of materials each year in the United States. Aggregates are the building blocks of modern society and are vital for constructing and maintaining heavy infrastructure such as roads, railways, bridges, tunnels, data centers, warehouses, residential buildings, water supply systems, sewers, electrical grids and telecommunications networks.

NSSGA supports efforts to address structural imbalances and non-market policies that create global excess capacity and distort trade, pricing, and competitiveness. Any Section 301 response should be carefully designed to avoid unnecessary impacts on downstream industries and infrastructure supply chains not responsible for the practices at issue.

In related proceedings, NSSGA opposed proposed port fee mechanisms, and those concerns remain. Although NSSGA appreciates USTR's decision to pause those fees, it continues to believe these fees would impose broad indirect costs across U.S. supply



chains without effectively addressing the structural excess capacity issues under review and should not be adopted in this docket.

NSSGA opposes the comments of other submitters urging USTR to include port fees affecting shipping logistics in addressing unfair trade practices. We believe any remedies to practices that are actionable under 301(b) should specifically exempt aggregates transportation and logistics. Excess structural capacity for aggregates production does not exist, in our judgment and should therefore be excluded from any remedial actions taken under 301(b).

The aggregates industry operates in a high-volume, low-margin logistics environment, so even modest increases in maritime or port-related costs can raise delivered material prices, delay projects and increase infrastructure costs.

NSSGA is concerned that broad trade remedies affecting maritime transport or port entry costs could increase friction across global shipping networks and raise costs for domestic producers and consumers that rely on efficient construction material supply chains.

As the United States continues major transportation, energy, and water infrastructure investments, predictable and efficient material supply chains are critical to delivering projects on time and on budget. Added maritime cost pressures or uncertainty would create avoidable challenges for project planning and execution.

NSSGA supports strong trade enforcement, but remedies should be targeted, proportionate and tailored to avoid unintended consequences for downstream industries that are not the source of the underlying concerns.

For these reasons, NSSGA urges USTR to ensure any actions under this investigation are narrowly scoped, evidence-based and designed to minimize disruption to critical domestic supply chains. NSSGA also reiterates its opposition to broad port fee mechanisms and supports maintaining the current pause on those measures.

NSSGA appreciates the opportunity to submit these comments and incorporates by reference its prior submissions on related Section 301 actions, maritime policy proposals and vessel-related modifications.

Sincerely,



Michele Stanley
CEO and President
National Stone, Sand & Gravel Association

