

October 17, 2025

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Hon. Howard W. Lutnick
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

RE: Comments on Section 232 National Security Investigation of Imports of Robotics and Industrial Machinery (Docket XRIN 0694-XC138)

Dear Secretary Lutnick,

Business Roundtable (“the Roundtable” or “BRT”) respectfully submits these comments to the Department of Commerce (“Commerce”) and Bureau of Industry and Security (“BIS”) in response to the request for public comments on the national security investigation of imports of robotics and industrial machinery under Section 232 of the Trade Expansion Act of 1962, as amended (“Section 232”).¹ Business Roundtable is an association of more than 200 chief executive officers (“CEOs”) of America’s leading companies, representing every sector of the U.S. economy. BRT CEOs lead U.S.-based companies that support one in four American jobs and almost a quarter of U.S. gross domestic product. BRT appreciates the opportunity to comment as the products within the scope of this investigation reach across the operations of the Roundtable membership.

BRT supports the Administration’s goal to increase domestic production of and strengthen U.S. competitiveness in the robotics and industrial machinery sectors. However, BRT believes that any remedial action taken pursuant to this Section 232 investigation should avoid tariffs, which would create unnecessary barriers to products that are essential to expanding and modernizing U.S. manufacturing. If Commerce *does* propose tariffs on imports of robotics and industrial machinery, it should recommend that the President stay their imposition until tailored plans can be developed by the Administration, in consultation with industry, to ensure they do not inadvertently undermine U.S. manufacturing, competitiveness and innovation. To effectively accomplish its goals of bolstering domestic manufacturing, the Administration should take a strategic approach that enables U.S. production to be more cost-effective and efficient.

¹ *Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Robotics and Industrial Machinery*, 90 Fed. Reg. 46,382 (Sept. 26, 2025) (XRIN 0694-XC138).

I. Given the Critical Role of Robotics and Industrial Machinery throughout the Economy, Barriers to Access Would Undermine U.S. Manufacturing Goals

Robotics and industrial machinery are a linchpin in the supply chains of many BRT member companies, suppliers and customers. They are essential for U.S. business operations and efforts to utilize the most advanced robotic and industrial machinery technologies available. The significant reach of this investigation and potential impacts necessitate targeted and creative solutions rather than tariffs.

Imposing tariffs on these products would not best serve U.S. economic and national security interests. Tariffs on a broad swath of critical manufacturing inputs would significantly increase costs on manufacturing equipment and machinery in factories across the United States. This could in turn stall investment in new plants and equipment at a time when the Administration seeks to increase U.S. industrial strength and economic security. Producers of robotics and industrial machinery utilize global supply chains with relatively little room to cut costs or trim profit margins to cover additional tariffs. Thus, any tariff-related costs would likely be passed through to American manufacturers who are committing substantial capital to revitalize their manufacturing competitiveness using modern robotics and industrial machinery.

Manufacturers in all sectors are incorporating robotics, automation solutions, and industrial machinery to drive safety, quality and productivity, including throughout the aerospace and defense, automotive, electronics, energy, logistics, retail and technology sectors. Robotics are transforming operations, reducing physical strain and opening opportunities for workers to develop new skills.

The imposition of broad tariffs would adversely impact investment in process and efficiency improvements to existing facilities, construction of new and expanded facilities, and performance of necessary maintenance. U.S. manufacturers would be impacted regardless of whether they are legacy producers modernizing existing facilities or new investors attempting to build production operations from the ground up. In the worst scenario, rising prices for robotics and industrial machinery could make it cost prohibitive to continue making certain products in the United States.

Tariffs on robotics and industrial machinery would act as a headwind for the Administration's efforts to deploy new U.S. investment commitments. Increasing costs would decrease return-on-investment in robotics and industrial machinery that would slow U.S. productivity growth and profits, even on projects that do move forward. Increasing tariff costs as companies are investing in projects in the United States would be counterproductive to several of the Administration's goals, including U.S. manufacturing growth, energy dominance, AI dominance and job growth.

Competitors around the globe are currently deploying robotics and industrial machinery at a rapid pace and any U.S. factories lacking the latest technology risk becoming uncompetitive.

Subjecting urgently needed robotics and industrial machinery to tariffs runs a serious risk of forestalling the introduction of these important technologies in both the factory upgrades and greenfield expansions which are central to President Trump's goal of revitalizing U.S. manufacturing. The Roundtable urges the Administration to consider alternative courses of action following a thorough and transparent Section 232 investigation.

II. Even if Tariffs Were to Be Imposed, the Administration Should Stay Implementation to Permit a Comprehensive Evaluation of the Affected Supply Chains

If, notwithstanding the risks identified above, Commerce determines to move forward with a new tariff regime on robotics and industrial machinery, the Roundtable urges Commerce to stay implementation to allow for the development of tailored plans with American industry. Given the broad scope of impact, it is imperative that Commerce design nuanced and effective tariff regimes which will not undermine efforts to modernize existing manufacturing facilities and the promise of new construction.

Commerce should recognize that the expansion, upgrade, or creation of manufacturing operations requires years of work, including significant time to train and hire workers, and get production lines running. Many such projects are already planned or underway, and lead times on orders of robotics and industrial machinery products can be six months or longer, given the specialized nature of the product.

Industrial machinery and parts generally come from trading partners like the European Union (EU), Japan, South Korea, Taiwan and Mexico. The Roundtable encourages the Administration to establish preferential trade in industrial machinery and parts with these trading partners, all of whom are critical to manufacturing this equipment. Preferential treatment of USMCA qualifying goods should remain in order to preserve investments made by U.S. manufacturers. It is essential to work collaboratively with allies to maximize the value of robotics and industrial machinery to American manufacturing as full-scale, rapid onshoring will be challenged by high costs, workforce shortages and the lack of a robust domestic supplier ecosystem.

The United States does not currently have the capacity to produce the full complement of robotics and industrial machinery sufficient to meet the needs of all U.S. manufacturing operations. This includes components, sub-assemblies and raw materials such as actuators, motors, graphics processing units and thermal vacuum chambers. Delayed delivery of robotics and industrial machinery used in manufacturing could risk causing unplanned downtime for U.S. manufacturers, in turn delaying product delivery for consumers of anything from pharmaceuticals to advanced electronics. Stalling U.S. capacity to produce robotics and industrial machinery would put the United States at a competitive disadvantage and boost efforts of countries, like China, to develop and maintain a dominant position in this field. Notably, for the first time in 2024, Chinese manufacturers of industrial robots sold more than

foreign suppliers in China, as their domestic market share climbed to 57 percent.² Further, tariffs on foreign-sourced robotics technology and equipment that directly support server manufacturing and critical data center operations in the United States risk damage to the U.S. position as the leader in AI and critical emerging technologies.

Finally, any potential tariff remedy should be construed as narrowly as possible to address national security risks and should neither establish a tariff inclusion process, which would inject additional cost, complexity and uncertainty upon American industries that depend on robotics and industrial machinery; nor stack with any other tariffs on robotics and industrial machinery.

III. Policies to Incentivize Domestic Robotics and Industrial Machinery Production

While Business Roundtable acknowledges the critical importance of the robotics and industrial machinery sectors, bolstering U.S. manufacturing activity is better addressed through a targeted suite of domestic policies to reduce domestic production costs. Further, maintaining a reliable supply of covered products while domestic capacity scales up will be important as companies incorporate robotics and industrial machinery into U.S.-based projects.

Accelerating advanced manufacturing requires stable economic conditions and consistent policy support over decades. Relocating or expanding manufacturing production in the United States is time-consuming, costly and complex. Building a new manufacturing facility has high costs and can take more than five years, including the time and cost to comply with regulations. To support the expansion of the domestic robotics and industrial machinery manufacturing base, Commerce should work across the Administration and with Congress to initiate strategic policy reforms that will make production more cost-effective and efficient. For the full scope of Business Roundtable's recommendations for building domestic manufacturing capacity, please review our recent report, [Revitalizing American Manufacturing](#). Recommendations include:

- Competitive Tax Policy: Maintain a low corporate tax rate with policies that lower the cost of domestic investment, research and development, and manufacturing.
- Permitting and Regulatory Reform: Reduce regulatory hurdles, including by streamlining permitting policies, and support innovation by accelerating product approvals where appropriate.
- Strategic Trade Policy: Promote market access for U.S. exporters and combat unfair trade practices.
- Energy and Infrastructure: Ensure affordable, reliable access to energy and strong public infrastructure.
- Workforce Development: Support the U.S. workforce through skills development, partnerships with education and training providers, and legal immigration.

² International Federation of Robotics, "Global Robot Demand in Factories Doubles Over 10 Years," Sept. 25, 2025, [Global Robot Demand in Factories Doubles Over 10 Years - International Federation of Robotics](#).

IV. Conclusion

Business Roundtable appreciates Commerce's recognition that reliable supply chains for robotics and industrial machinery are important to the security and competitiveness of the United States. Nevertheless, the fact that these products are utilized across virtually every sector of the U.S. economy necessitates a judicious approach. Tariffs are ill-suited to safeguard U.S. economic security in this instance and should be avoided to ensure domestic investments are not undermined. If tariffs *are* deemed necessary, Commerce should recommend that any tariff regime be stayed pending the development of a tailored plan, in consultation with industry, that secures supply chains without inadvertently undermining U.S. manufacturing.

BRT looks forward to working with Commerce as it refines the scope of the investigation and encourages additional opportunities for stakeholder engagement, including public hearings and industry forums, to ensure that the practical implications of the investigation are fully understood and any unintended consequences are avoided.