



OUR MEMBERS LIFT & MOVE THE WORLD

BEFORE THE OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

Section 301 Investigation

Docket No. USTR-2026-0067

COMMENT OF THE SPECIALIZED CARRIERS & RIGGING ASSOCIATION

Submitted on behalf of SC&RA and its 1,350+ Member Companies

April 15, 2026

Ambassador Jamieson Greer
United States Trade Representative
600 17th Street NW Washington, DC 20508

Dear Ambassador Greer:

The Specialized Carriers & Rigging Association ("SC&RA") respectfully submits this comment in response to the Office of the United States Trade Representative's ("USTR") request for public comments in the above-captioned Section 301 tariff proceeding. Per the Federal Register notice, USTR requests that comments specifically address: (i) the acts, policies, and practices of investigated economies creating or maintaining structural excess capacity or production in specific sectors, (ii) whether the acts, policies, and practices are unreasonable or discriminatory, (iii) whether the acts, policies, and practices burden or restrict U.S. commerce, and if so, the nature and level of the burden or restriction, (iv) whether the act, policies, and practices are actionable under Section 301(b) of the Trade Act, and what action, if any, should be taken, including tariff and non-tariff actions, and (v) whether there are additional considerations for assessing acts, policies, and practices that contribute to structural excess capacity. This submission focuses on why tariffs on construction cranes and specialized trailers from the European Union and Japan are counterproductive to the Administration's stated objectives, and why the appropriate government response to China's structural overcapacity in this sector is to preserve cost-competitive and fairly traded imports from allied nations at rates lower than those applied to Chinese merchandise.

I. Introduction and Interest of Commenter

SC&RA is the premier trade association representing the specialized transportation, crane, and rigging industry in the United States. SC&RA represents over 1,350 member companies. SC&RA's members form the backbone of U.S. critical infrastructure construction — an industry that contributes approximately \$4.7 trillion to U.S. GDP and employs 27 million American workers. The Department of Homeland Security has designated SC&RA's sector as essential critical infrastructure within the Transportation and Logistics subsector.¹ In addition, SC&RA's position on this issue is supported by regional crane owner associations, including the Texas Crane Owners Association ("TCOA"), the Florida Crane Owners Association ("FCOA"),

¹ "Guidance on the Essential Critical Infrastructure Workforce," Department of Homeland Security, Cybersecurity and Infrastructure Security Agency (March 28, 2020).

the Crane Owners Association ("COA"), the Northwest Crane Owners Association ("NWCOA"), and the Mobile Crane Operators Group ("MCOG").

The scope of this comment encompasses tower cranes, mobile cranes, rough terrain cranes, crawler cranes, all-terrain cranes, specialized trailers, and related parts sourced from the EU and Japan (the “products” or “merchandise”). This submission expressly excludes ship-to-shore ("STS") cranes, which are subject to a separate tariff framework and fall outside the scope of this proceeding.

II. Unlike Chinese Construction Cranes, EU and Japanese Cranes Do Not Benefit from Acts, Policies, or Practices That Promote Structural Excess Capacity and Production

Section 301 authority targets unfair trade practices. **These comments will not attempt to catalog or belabor the unreasonable and discriminatory acts, policies, and practices of the People’s Republic of China that have created and maintained structural excess capacity and production in numerous manufacturing sectors. These facts are well known and documented. SC&RA has no doubt that China’s actions are actionable under Section 301, and SC&RA supports the Administration’s goals of addressing Chinese structural overcapacity and the harms it causes to the American steel and metals sector.**

The EU and Japan, on the other hand, are proven, trusted allies that do not engage in industrial overcapacity, dumping, forced labor, or any other unfair trade practice with respect to these products. There is no basis in the Section 301 investigation for including merchandise from these countries within the scope of the proposed tariff action.

Production of high-quality construction cranes is not a commodity operation. Cranes are essentially made to order, and are produced to customer specifications based on their specific needs. Manufacturers must bring together steel and metal parts with hydraulics, motors and control systems, and tie them all together with sensors and software. Design and construction requires a specialized set of engineering and design skills in which safety is critical and there is a low tolerance for error. It takes a highly integrated ecosystem of specialized production for all these inputs to properly come together. Many of the producers in this industry are closely held, family-owned generational operations, in which the skilled craft of building these cranes is passed down through lengthy training and apprenticeship. In contrast to recent Chinese market entrants, producers in the United States, Europe, and Japan have honed these operations over long cycles of investment and planning, and have not benefited from overcapacity in any of their inputs (specialty steel, hydraulics and motors, engineering and design, specialized labor).

Furthermore, these products are not true steel derivatives. Steel represents a minority of total product value; the value of these products derives overwhelmingly from precision engineering, design, and manufacturing. The current tariff scheme disproportionately impacts these products because of their very low steel content relative to total economic value. These products are built to customer specification, not mass-produced — no importer brings these into the United States to circumvent steel tariffs or evade onshoring goals. SC&RA believes that the misclassification of these products as Section 232 steel derivatives in August 2025 was inadvertent. Extending Section 301 coverage to these products would compound the earlier error.

III. For Section 301 Tariffs to Successfully Address and Eliminate China's Practices, Care Must Be Taken To Ensure Other Section 301 Tariffs Do Not Undermine Those Goals

Extending Section 301 tariffs to European and Japanese products undermines the goal of forcing China to reverse course on its practices that result in structural overcapacity. Since the tariff situation has changed from IEEPA-based tariffs at highly different rates to Section 122-based tariffs at equivalent rates, the competitive landscape has significantly shifted in China's favor by reducing the tariff pressure on Chinese products. The duties on these products, whether imposed through Section 301 or Section 232, demand differentiation based on the degree of harm presented by specific nations. At this moment, however, all countries are subject to the same duties on these products. The result is extremely advantageous for Chinese exporters, to the detriment of EU and Japanese trading partners and, ultimately, domestic national security and economic interests. It is now more urgent than ever to preserve cost-competitive access to trusted and fairly traded EU and Japanese suppliers. Piling Section 301 duties onto existing Section 232 duties at this moment would accelerate Chinese market penetration into the U.S. crane market.

The STS crane precedent demonstrates that tariffs on non-Chinese goods do not eliminate China's dominance. China now controls over 70% of global STS crane production despite existing tariff regimes. Applying the same undifferentiated logic to mobile, tower, crawler, and rough terrain cranes risks replicating that outcome in a sector where U.S. critical infrastructure is directly at stake.

The only practicable and effective way to counter China's crane market strategy is to maintain a healthy, fairly operating, and cost competitive EU and Japanese supply chain that can outcompete Chinese alternatives on quality and reliability. Increasing tariffs on those allies destroys that competitive, quality-based buffer, and so does subjecting all exporters, regardless of origin, to the same duty rate. Chinese manufacturers have demonstrated the ability to undercut EU and Japanese pricing by approximately 50% even with existing tariffs in place. Any additional cost burden on EU and Japanese merchandise will accelerate the shift to Chinese sourcing.

The practical effect of applying Section 301 to EU and Japanese cranes and trailers would therefore achieve the opposite of the investigation's stated purpose: it would entrench, rather than reduce, U.S. dependence on Chinese industrial production, and would reward China's structural overcapacity with greater market share.

IV. An Adequate Supply of EU and Japanese Cranes and Parts is Vital to Ensure the Production of Domestic Critical Infrastructure

A supply of trustworthy, fairly-traded cranes is necessary for America to build out its manufacturing sector and critical infrastructure. As a result of the lack of domestic availability, approximately 80% of the cranes used in U.S. maintenance, repair and construction are imported; the U.S. manufacturers that do exist rely heavily on the availability of high-quality imported parts from Europe and Japan. Less than 3% of global all-terrain cranes, which is a significant product type that is essential to domestic critical infrastructure projects, are manufactured in the U.S. No U.S. company manufactures tower cranes. The U.S. is experiencing a severe shortage of cranes to execute construction projects vital to the U.S. economy, let alone serve economic growth. U.S. manufacturers cannot meet the current needs and demands for cranes, and the lead-time to build additional U.S. manufacturing capacity is projected to be five to seven years. Domestic production of rough

terrain, crawler, all-terrain, and mobile cranes is insufficient in both unit volume and model range. Yet all these cranes are required for the construction necessary for industrial and economic growth.

Critical infrastructure projects and the construction of factories and other manufacturing facilities are underway now. Procurement cycles for cranes run nine to twelve months, as the products are made to customer specification. New domestic manufacturing capacity would require five to seven years to build. Construction projects cannot pause for years while domestic capacity theoretically develops. Imposing tariffs on fairly traded specialty goods that cannot be produced domestically in adequate quantities and timeframes would be an exercise in futility that will harm, rather than help, American industry.

No critical infrastructure project proceeds without these cranes. The critical sectors include rare earth mining, nuclear energy, oil and gas, defense, aerospace, data centers, semiconductor fabrication, transportation, shipbuilding, highway bridges, and public infrastructure.

The demand for lifting equipment will increase dramatically with data center and AI infrastructure buildout. This is precisely the sector the Administration has identified as a national priority, and domestic supply cannot keep pace under any scenario. SC&RA members are themselves designated by DHS as essential critical infrastructure — disrupting their ability to access necessary equipment disrupts the entire downstream construction supply chain.

The problem also extends upward in the supply chain. Ultra-high-strength steel grades essential to crane and trailer manufacturing — including S960QL, S1100, and S1300 — are not produced domestically in sufficient quantities. U.S. steel manufacturers have indicated that there is no viable business case to produce this specialty steel at the volumes required. U.S.-based crane and specialized construction trailer manufacturers must import this steel from the EU and Japan — there is no domestic workaround under any foreseeable timeline. The complex design and manufacturing chains for these products further underscore the difficulty of onshoring production quickly.

V. Chinese Overcapacity Is Leading To Market Capture and the Current Tariff Situation Harms U.S. Industry and Fairly Traded EU and Japanese Products

The recent change in tariff rates has compounded the situation in favor of China's structural overcapacity. The IEEPA-based tariffs had significantly different rates for Chinese products compared to European and Japanese cranes. The current Section 122-based tariff rates are the same, for all three economies. This change has significantly shifted the competitive landscape in China's favor by making Chinese alternatives relatively more competitive. Adding Section 301 on top of Section 232 for EU and Japanese goods, or otherwise failing to distinguish the tariffs on these products between China and the EU and Japan, would dramatically accelerate the shift to Chinese sourcing. In other words, the current tariff structure, if extended via Section 301 tariffs, creates the conditions for Chinese market capture that the Administration's tariff policy was designed to prevent.

Although this submission is not about the Section 232 tariffs, they provide important context for the actions USTR should take with respect to European and Japanese merchandise. The effective rate on EU and Japanese cranes and trailers under the current Section 232 framework — now at 25% on the total merchandise value — is already causing a market shift to cheaper and lower quality products produced with China's

structural overcapacity. The current rate does not bear any relationship to a security threat presented by EU or Japanese manufacturers, is disproportionate to any such threat, and only benefits the Chinese overcapacity that is the core subject of this proceeding.

Chinese manufacturers are actively targeting the U.S. crane market. Chinese cranes are already available at approximately 50% of the cost of US, EU, and Japanese alternatives, even with existing tariffs in place. The pricing gap is structural, not marginal. The only thing slowing Chinese market capture is that quality and safety risks are real and material. Cranes are used for critical load-bearing applications on high-stakes job sites. Lower-cost Chinese products may not meet the structural standards of US, EU and Japanese alternatives, increasing risk to American workers and causing delays. Because they rely on sensitive software, telemetry, and remote diagnostics, their deployment on critical infrastructure and defense-related projects raises national security, supply-chain, and safety concerns, compounded by inconsistent manufacturing standards and weaker regulatory oversight.

The STS crane precedent bears repeating: Section 301 tariffs on STS cranes have not prevented Chinese dominance of over 70% of global production. Applying the same logic to mobile, tower, crawler, and rough terrain cranes risks replicating that outcome in a sector where U.S. critical infrastructure is directly at stake.

VI. Section 301 Tariffs at Any Level Are Not Appropriate for EU and Japanese Merchandise

The current effective rate on these products with potential Section 301 additions could be catastrophic for domestic national security and infrastructure projects, nearly all of which require these products. Off-Highway Research reported in September 2025 that construction equipment costs are already projected to rise 27% overall and approximately 45% for imported equipment. Further rate increases under Section 301 would push those figures to levels that halt critical infrastructure projects entirely.

SC&RA's position is that zero is the appropriate rate for EU and Japanese cranes, specialized construction trailers, and related parts (e.g. high strength steel) under Section 301. These goods pose no national security threat, originate from allied nations, and are not the product of any unfair trade practice. The current and potential tariffs on these products are counterproductive to the very policy goals they are intended to achieve. By hindering construction, they hinder the growth of domestic manufacturing at the heart of the Administration's trade agenda.

VII. If Any Section 301 Tariffs Are Applied to EU and Japanese Merchandise, They Should Be Carefully Calibrated to Achieve the Administration's Policy Goals

If USTR declines to exempt EU and Japanese merchandise entirely, we have demonstrated above that a simple application of blanket tariffs hinders rather than furthers the Administration's goals of addressing Chinese structural overcapacity and ensuring the growth of the American manufacturing sector. SC&RA shares these goals, and so is providing comments on issues USTR should consider if nonetheless it chooses to impose Section 301 tariffs on these goods.

SC&RA urges that any rate be set at a level that reflects the products' criticality in advancing domestic national security and economic interests, and that does not stack on top of existing Section 232 duties. Stacking would be commercially devastating. The precedent exists for such action. For example, in

implementing the U.S.-EU Framework Agreement, USTR and the Department of Commerce amended the 232 tariffs on automobiles and automobile parts such that the combined tariff would be no higher than the 15% maximum reciprocal tariff rate then in effect.² Given the critical nature of these imports to the growth of the domestic economy, that logic applies here as well.

Additionally, SC&RA strongly urges a 24-month phase-in period if any duties on EU and Japanese merchandise are imposed. Even a 180-day phase-in is wholly inadequate for this industry. Crane procurement cycles alone run nine to twelve months from order to delivery, and project planning cycles for the critical infrastructure sectors these cranes serve run multiple years.

Multi-year infrastructure projects — including data centers, nuclear facilities, LNG terminals, and semiconductor fabrication plants — cannot absorb sudden tariff changes mid-contract. An immediate increase in tariffs with no phase-in could lead to breaches in existing commitments across the industry and could also impact ongoing construction projects. The April 2, 2026, proclamation amending the Section 232 tariff framework upended contracts and costs overnight, as it did not include an on-the-water exemption.

A 24-month phase-in would allow SC&RA members to fulfill orders already in process, honor existing customer contracts, and conduct orderly business planning — consistent with the Administration's own recognition in Executive Order 14346 that modifications may be necessary based on the national interest. Any phase-in should also include a grace period for merchandise already in transit or under contract at the time of enactment.

Should the Administration decide to impose Section 301 duties on EU and Japanese crane products, SC&RA urges the Administration to consider the use of a tariff-rate quota on these products to ensure the availability of a sufficient supply to support critical infrastructure and construction needs. For the three years prior to the appearance of unfairly traded Chinese imports, the EU and Japan provided approximately 1,150 cranes of the types and varieties critical to building America. Demand for cranes is only expected to increase in the future, as the American economy grows. A tariff rate quota that allows such an amount of Japanese and EU products to enter at a zero rate and satisfy domestic needs would allow the potential for unchecked domestic economic growth to continue. Changes in the quota could be tied to an index reflecting domestic demand. At the same time, the quota would allow the fairly traded products to better compete against the unfairly traded Chinese products, and encourage the growth of domestic capacity to meet the future growth in demand.

VIII. Impact on Small Businesses and the American Workforce

The majority of SC&RA members are closely held, family-owned businesses operating on thin margins with limited capacity to absorb sudden tariff changes. For small businesses, even modest tariff increases force layoffs, canceled projects, and broken customer commitments. Such disruption also puts above-average wages at stake. Crane operators, riggers, welders, electricians, truck drivers, and construction equipment operators are all well paid, and constitute approximately 27 million workers nationally.

² "Implementing Certain Tariff-Related Elements of the U.S.-EU Framework on an Agreement on Reciprocal, Fair, and Balanced Trade," 90 Fed. Reg. 46136 (Dep't Commerce, USTR, Sept. 25, 2025).

IX. Consistency with Buy American Principles

SC&RA members serve publicly funded projects subject to the Buy American Act and other domestic procurement requirements. Both frameworks already recognize that where domestic supply is unavailable, fairly traded foreign-sourced goods from trusted partners are appropriate and in the public interest. Targeted relief for EU and Japanese merchandise is consistent with, not contrary to, Buy American goals. It enables the construction of the very domestic infrastructure those principles are meant to advance. Increasing the buying of American products in the future requires more domestic manufacturing, which in turn requires more domestic construction. Harming the ability to complete these construction projects only hinders the growth of domestic production.

X. Requested Relief

SC&RA respectfully requests the following relief:

First, SC&RA requests that the applicable tariff rate for EU and Japanese cranes, trailers, and parts be set at zero under Section 301. These products are not the product of, or related to, any unfair trading practices that are the subject of the Section 301 investigations. If USTR decides otherwise, SC&RA urges that any rate reflect the products' criticality to domestic interests and the Administration's economic goals.

Second, SC&RA requests that tariff rates on these products from China be amended in a manner proportionate to the national security threats and unfair trading practices engaged in by China. A one-size-fits-all global tariff rate on these products has the unintended consequence of allowing China to use its structural overcapacity to take U.S. market share from fairly traded imports, while doing little to address the impact of the overcapacity on U.S. domestic production. This only further incentivizes China to engage in the practices the tariffs are intended to address. Tariffs on China must be set with a level in mind that allows any fairly traded imports the opportunity to supply the U.S. market with critically needed construction inputs.

Third, SC&RA requests similar tariff treatment on ultra-high-strength steel grades (S960QL, S1100, S1300) imported from the EU and Japan that are not and will not be produced domestically in sufficient quantities. Tariffs on these critical inputs equally impact SC&RA's members who produce these cranes and trailers in the United States. Tariffs on these inputs make it significantly harder to compete against the flood of low-quality Chinese imports.

Fourth, SC&RA requests that USTR refrain from stacking the Section 232 and Section 301 tariffs for these European and Japanese products.

Fifth, SC&RA requests that any Section 301 tariffs that will be imposed on European or Japanese cranes and trailers be implemented over a 24-month phase-in period, with a grace period for merchandise already in transit or under contract.

Sixth, SC&RA requests that USTR consider a tariff-rate quota for any Section 301 tariffs that will be imposed on European or Japanese cranes and trailers. Ensuring availability of a historical amount of fairly traded imports will protect the domestic market and U.S. producers from an influx of low quality imports.

XI. Conclusion

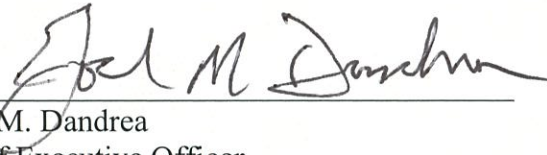
SC&RA fully supports the Administration's goals of countering China's unfair trade practices and strengthening U.S. manufacturing and critical infrastructure. Targeted, well-calibrated trade remedies directed at Chinese practices advance those goals. Applying Section 301 to EU and Japanese cranes and trailers does not. It undermines them.

The recent change in the tariff landscape has already shifted the competitive dynamics in China's favor. This is precisely the wrong moment to impose additional cost burdens on the fairly traded products of EU and Japanese allies whose products are the only viable alternative to Chinese equipment. The result would be a crane market increasingly dependent on China, with lower safety standards and diminished U.S. control over the construction of its most critical infrastructure.

In a separate transmittal, SC&RA will request the opportunity to testify at the upcoming hearing.

Respectfully submitted,

SPECIALIZED CARRIERS & RIGGING ASSOCIATION



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Chief Executive Officer
April 15, 2026