September 9, 2025

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

RE: Comments on Section 232 National Security Investigation of Imports of Wind Turbines and Their Parts and Components (90 Fed. Reg. 41380, August 25, 2025 XRIN 0694-XC133)

Dear Secretary Lutnick:

The National Foreign Trade Council ("NFTC") appreciates this opportunity to provide input as part of the Department of Commerce's ("the Department") investigation to determine the effects on national security of imports of wind turbines and their parts and components under section 232 of the Trade Expansion Act of 1962, as amended (Docket No.250818-0143, XRIN 0694-XC133).

Overview:

The U.S. wind industry has existed for decades, creating thousands of jobs as a result of stable policies that have generated billions in investments across more than 40 states. The U.S. has announced or invested $10 billion in its offshore wind supply chain; meeting the need for a domestic supply chain that can support 4-6 GW of offshore wind each year will require $22 billion in investment over the next 6-9 years. Onshore and offshore wind power helps to fill the growing need for power that is closely tied to critical infrastructure and other national security imperatives. Trade policies should be carefully calibrated to minimize unintended consequences that would impede or slow the growth of the domestic wind industry.

The transatlantic wind industry is committed to building more U.S. manufacturing capability. The U.S. currently relies on 30+ years of offshore construction in Europe. Imposing tariffs on the wind turbine supply chain could erode the ability to expand U.S. manufacturing capability as wind turbines and their parts and components are sourced from North America and Europe. U.S. suppliers are limited and also source parts and components from other countries. Moreover, parts and components used in wind turbines are also used to support other products that are critical to the Administration's commitments to energy dominance and national security. These include, but are not limited to: power transformers, copper cables, low voltage drives, stators, motors and rotors. Imposing tariffs on the imports of these and related parts and components needed to manufacture wind turbines will be counterproductive and drive up the costs of domestic wind turbines and other energy products.

Responses to BIS' questions:

The Federal Register Notice soliciting public comment on this Sec. 232 national security investigation into imports of wind turbines and their parts and components seeks to answer several key questions, including:

1. **(i) What is the projected demand for wind turbines and their parts and components in the United States?**

   Industry forecasts the need for 44GW of onshore, offshore and repowering over the next four years.[1]

2. **(v) What is the impact of foreign government subsidies and predatory trade practices on the competitiveness of the wind turbine and parts and components in the United States?**

   The wind turbine industry is highly diversified and is led by European and U.S. original equipment manufacturers (OEMs).[2] These transatlantic OEMs are the largest suppliers to the U.S. market, with extensive manufacturing operations in the U.S. and Europe. Foreign subsidies have not impacted U.S. competitiveness in this industry because these supply chains deliver to the U.S. market.

3. **(vi) What is the economic impact of artificially suppressed prices of wind turbines and their parts and components due to foreign unfair trade practices and state sponsored overproduction?**

   Imports from non-market economies of wind turbines and their parts and components have significantly declined since 2020. U.S. projects are awarded under transparent state-level procurement processes that favor established U.S. and European OEMs.

4. **(vii) What is the potential for export restrictions by foreign nations, including the ability of foreign nations to weaponize their control over supplies of wind turbines and their parts and components?**

   The risk of foreign nations "weaponizing" component supply for U.S. wind projects is mitigated by U.S. developers and OEMs sourcing primarily from domestic and

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[1] https://www.woodmac.com/press-releases/us-q1-wind-installations-increase-91-yoy-but-uncertain-regulatory-environment-stalls-turbine-orders/

[2] https://www.energy.gov/sites/default/files/2023-08/land-based-wind-market-report-2023-edition.pdf

allied European countries. The U.S. wind industry is also able to adjust sourcing, including from domestic supplies, as policy priorities shift.

5. **(viii) What is the feasibility of increasing domestic capacity for wind turbines and their parts and components to reduce import reliance?**

   The wind industry has proven highly responsive to market signals and requests from its large U.S. customer base. With stable demand policies, onshore wind OEMs have consistently built local manufacturing, as evidenced by U.S. tower, blade, and nacelle assembly plants.[3] In addition, subcomponents are increasingly available in North America, demonstrating that increased domestic capacity is feasible and underway.

6. **(ix) the impact of current trade policies on domestic production of wind turbines and their parts and components, and whether additional measures, including tariffs or quotas, are necessary to protect national security;**

   Wind turbine imports do not present a threat to national security because the U.S. domestic supply chain continues to grow and the remaining foreign supply chain is dominated by allied European nations.[4]

7. **(xi) What is the ability of foreign persons to weaponize the capabilities or attributes of foreign-built wind turbines and their parts or components?**

   The structure of the U.S. wind market makes foreign control unlikely. Contracts, certification standards, and financing are tied to trusted U.S. and European suppliers.

   The most effective way to continue strengthening this resilience is through policy stability that supports long-term domestic investment, not the imposition of trade barriers.[5] Instability in the wind market risks weakening established supply chains, which could introduce vulnerability to non-U.S. and allied sources.

Conclusion:

The administration recognizes the need for energy dominance to meet other policy objectives including AI dominance in the world as described in the President's "AI Action Plan". Support for a robust domestic wind industry by removing regulatory and other impediments will have greater lasting impact than the imposition of tariffs. The U.S. wind industry supports over 100,000 high-paying jobs across all 50 states. Over 500 factories build parts for the wind industry. Tariffs on manufacturing inputs disproportionately affect the wind industry with a cascade of impacts that include job losses and a weakened supply chain. Contraction in the wind industry also affects other industries that have been

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[3] https://emp.lbl.gov/publications/land-based-wind-market-report-2024

[4] https://docs.nrel.gov/docs/fy24osti/90525.pdf

[5] https://www.energy.gov/eere/wind/securing-us-supply-chain-wind-energy-industry

prioritized by this administration, such as shipbuilding. Fostering and ensuring a robust domestic wind industry is critical to meeting energy needs and other policy objectives.

About NFTC

The NFTC, organized in 1914, is an association of U.S. business enterprises engaged in all aspects of international trade and investment, including maintaining competitiveness and technological leadership. Our membership covers the full spectrum of industrial, commercial, financial, and service activities, accounting for over $6 trillion in revenue and employing nearly 6 million people in the United States.

Thank you for your consideration of our comments. We welcome the opportunity to provide additional information and address any questions you may have. Please contact us at jchu@nftc.org, (703)225-8519 or Tiffany Smith tsmith@nftc.org, (703)966-1670.

Sincerely,

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Tiffany Smith
Vice President, Global Trade Policy

cc: Jeffrey Kessler
Under Secretary of Commerce for Industry and Security

Jamieson Greer
United States Trade Representative