

July 6, 2026

Hon. Jamieson Greer
United States Trade Representative
Office of the U.S. Trade Representative
600 17th Street NW
Washington, DC 20508

RE: Proposed Action in Section 301 Investigations of Various Economies Related to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced with Forced Labor Rights

Dear Secretary Greer,

The Energy Workforce & Technology Council (“EWTC”) is the national trade association for the global energy technology and services sector, historically known as the oilfield services (OFS) and equipment sector, representing more than 625,000 U.S. jobs in the technology-driven energy value chain. The U.S. energy services sector is strongly committed to U.S. energy dominance and maximizing the U.S. manufacturing base. EWTC appreciates the opportunity to provide comments on the proposed Section 301 Investigations.

EWTC and its member companies remain committed to supporting domestic energy production, strengthening supply chains, and reshoring key manufacturing. However, we would like to ensure that trade remedies are narrowly tailored and do not inadvertently increase overall costs and supply of materials and components for US energy manufacturing.

First, the draft section 301 rule has a number of provisions which EWTC supports:

EWTC Supports:

- EWTC supports the proposed rule not stacking 301 tariffs on top of existing 232 tariffs. This provision is critical to energy production as a significant portion of the most critical energy products are either partially or fully made of steel and aluminum.
- The exclusions included in the Annex A are helpful, although the list should be expanded to include additional critical energy components as well as expanding the scope to include energy products. For example, many products on the annex are limited in scope to aircraft, however the products are also critical to energy production.
- EWTC supports the exclusion of USMCA-qualifying goods from the new 301 duties. Mexico and Canada are critical integrated partners in the North American energy supply chain.

EWTC Requests USTR to Consider:

- While there is some relief for critical energy components in Annex A, there are many critical energy components which are not included and scope is limited on many. We request these annexes expand to include additional critical energy components vital to supporting American energy dominance.
- EWTC requests that any new section 301 duties continue to be made eligible for duty drawback.
- Certain specific equipment used in offshore energy production in the Gulf of America, such as undersea trees, are not produced in sufficient quantity in the United States. This specialized construction will be difficult if not impossible to reshore in the time period necessary to avoid significant cost increases to Gulf of America offshore production. Products that cannot readily be manufactured in the U.S. should be exempt from additional 301 duties due to their critical role in energy dominance.
- EWTC requests that tariffs resulting from this investigation do not stack on any other 301 tariffs.

Energy service companies are the backbone of the energy industry, providing both the technology and manpower needed to ensure the efficient production of oil and natural gas. The energy services sector is a critical partner in ensuring American energy dominance by providing essential components, including artificial lift systems, production enhancement tools, drilling fluids, tubulars, and fracking equipment. Many of the services and equipment are exceptionally technical and specialized. The sector is heavily invested in U.S. operations and contributes significantly to the domestic economy and job creation.

Our companies are on the front lines of achieving the President's stated goal of adding three million barrels per day to U.S. production. These companies are also invested in the broader national objective of reshoring critical manufacturing and strengthening domestic supply chains.

EWTC Member Investments in U.S. Manufacturing

In closing, I would like to again emphasize that our members are 100% behind the goals of this administration in reshoring as much manufacturing capacity possible and preventing any products produced with forced labor to enter the supply chain.

One member has invested over \$75 million in U.S.-based tube processing, heat-treat, and testing infrastructure over the past decade, co-funding R&D with American steel mills.

Our members manufacture frac spread components and artificial lift equipment in Oklahoma, completion tools in Louisiana, drill bits in Houston, oilfield tubulars in Corpus Christi, gas turbines in San Diego, and radiation measurement tools in Ohio. Another member is building digital infrastructure components in Shreveport, Louisiana, creating 600 new jobs and representing a \$18 million investment.

EWTC member companies will continue to reshore multiple elements of their supply chain however it is vital that critical energy components remain available throughout this transition.

We appreciate the opportunity to provide these comments and continued engagement with USTR on these important issues.

Sincerely,



Tim Tarpley
President
Energy Workforce & Technology Council