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## **PUBLIC DOCUMENT**

October 16, 2025

### **WRITTEN SUBMISSION**

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

**RE: Section 232 National Security Investigation of Imports of Robotics and Industrial Machinery and Their Parts and Components, BIS-2025-0257 / X-RIN 0694-XC138**

Dear Secretary Lutnick:

PRINTING United Alliance is pleased to provide the comments below on behalf of our members in the printing industry in response to the Bureau of Industry and Security (BIS) Federal Register *Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Robotics and Industrial Machinery and Their Parts and Components* (90 Fed. Reg. 46383).

### **About PRINTING United Alliance and the Printing Industry**

PRINTING United Alliance is the most comprehensive member-based printing and graphic arts trade association in North America, representing over 5,700 members of the industry's vast communities. Our members manufacture and deliver the printed communications, apparel, packaging, labeling, and related services that keep America's economy moving—and we are committed partners in building resilient, secure U.S. supply chains. The Alliance also produces the annual PRINTING United Expo which features a wide range of printing technologies and applications, with a focus on innovation and industry trends.

Integrated within the broader U.S. mailing ecosystem, the printing industry helps sustain more than 7.9 million American jobs and drives \$1.9 trillion in annual revenue.<sup>1</sup> By establishment count, our sector ranks third among all manufacturing industries; we rank tenth in terms of

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<sup>1</sup> EMA's 2023 U.S. Mailing Industry Economic Job and Revenue Study, <https://www.envelope.org/emaf/wp-content/uploads/sites/3/2023/11/EMA-Foundation-Jobs-and-Revenue-Study-11-1-23.pdf>

employees and fifteenth in total sales.<sup>2</sup> In short, the Alliance represents a significant segment of American manufacturing with a broad national footprint.

## **Background**

On September 2, 2025, the Secretary of Commerce initiated an investigation under Section 232 (19 U.S.C. 1862) to determine the effects on national security of imports of robotics and industrial machinery, and their parts and components.

## **Comments**

We support strong trade enforcement to protect U.S. industries and jobs and commend the Administration for its leadership supporting American manufacturing and industry. However, our members have serious concerns that tariffs could end up harming production by American businesses, particularly by including laser cutting tools, industrial stamping and pressing machines in this investigation. The printing industry uses a variety of industrial machinery, including large-scale offset, flexographic, and rotogravure printing presses for high-volume work, digital printers for on-demand and short-run jobs, and specialized equipment like screen printers and thermo-graphic printers. Post-press machinery such as cutting, folding, and binding machines are also essential for finishing printed materials.

Tariffs on industrial machinery used in the printing industry would directly undermine U.S. manufacturers' competitiveness by increasing the cost of essential equipment and replacement parts. Much of the advanced printing, converting, and finishing machinery used by American printers is not produced domestically at comparable scale or sophistication. These machines—often sourced from Europe and Japan—enable efficient, high-quality production runs that keep U.S. print operations globally competitive. Imposing tariffs would delay equipment upgrades, limit innovation, reduce productivity, and ultimately raise costs for downstream sectors that depend on printed materials, such as packaging, publishing, and consumer goods. In short, tariffs would penalize the very U.S. businesses that drive domestic production and employment in manufacturing, logistics, and distribution.

This potential tariff would further burden print service providers already facing higher costs from existing trade measures—including the 50% duty under the Section 232 aluminum and steel tariffs and the inclusion of aluminum lithographic printing plates effective August 1, 2025. In addition, the 10% duty on paper and paper-related products resulting from Section 232 tariffs on timber, lumber, and their derivatives, effective October 14, 2025, is expected to drive prices even higher. According to the National Association of Manufacturers (NAM), a Section 232 tariff on robotics and industrial machinery would affect some half a trillion dollars in manufacturing equipment and inputs.

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<sup>2</sup> 2022 *County Business Patterns*, U.S. Census Bureau for establishment, employment and 2022 *U.S. Economic Census of the U.S.*, U.S. Census Bureau for sales.

For printers, these tariffs directly raise costs with limited domestic production alternatives, intensifying pressure on supply chains already strained by global trade shifts. When critical inputs face steep duties without a viable domestic alternative, American printers are penalized with higher costs they cannot easily absorb in the form of lower profit margins or pass on to consumers. The result is delayed investment, reduced competitiveness, and ripple effects across sectors that rely on printed packaging and communications—from food and pharmaceuticals to retail and logistics.

In conclusion, any tariffs imposed under Section 232 on robotics and industrial machinery and their parts and components have the potential to devastate industry segments, increase costs for businesses and their customers, jeopardize jobs, limit supply, and threaten the viability of many American small businesses.

We urge the Commerce Department to reconsider implementing tariffs on robotics and industrial machinery and their parts and components, and while we understand that public hearings are discretionary for Section 232 investigations, we recommend the Department schedule a public hearing with all due speed. The unintended consequences of such a tariff would be far-reaching, ultimately placing U.S. manufacturers and the workers they employ at a competitive disadvantage.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'F. Bowers', with a stylized, flowing script.

Ford Bowers  
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cc: Jeffrey Kessler, Under Secretary, Bureau of Industry and Security, Commerce  
Department