

April 15, 2026

The Honorable Jamieson Greer  
United States Trade Representative  
600 17<sup>th</sup> Street NW  
Washington, D.C. 20508

**RE: Request for Comments on the Section 301 Investigations of Acts, Policies, and Practices of Certain Economies Relating to Structural Excess Capacity and Production in Manufacturing Sectors (Docket ID: USTR–2026–0067)**

Dear Ambassador Greer:

On behalf of [Common Sense America](#), I write to commend the Office of the United States Trade Representative's (USTR) timely decision to initiate investigations under Section 301 of the Trade Act of 1974 to scrutinize the impacts of harmful foreign manufacturing policies and practices. At Common Sense America, a grassroots organization dedicated to advancing policies that support America's economic independence, we believe that fortifying U.S. supply chains is essential to our security. The excess production of cement by foreign actors poses a threat to this, and these historic trade actions send a clear message that the United States will no longer tolerate unfair trade practices that undermine American producers.

The U.S. cement industry is a cornerstone of American industrial strength, supporting [hundreds of thousands of jobs](#) and generating billions in economic value each year. Beyond its fiscal contributions, cement is a vital input for our nation's most sensitive sectors, including critical transportation, water, housing, defense infrastructure, and much more.

Yet, the influx of unreliable products from foreign markets is not merely an economic issue; it is a threat to the safety and resilience of American infrastructure. Unlike U.S.-manufactured cement, which adheres to [rigorous safety and quality standards](#), cement from the countries identified for investigation often bypass the production standards and verification needed for high-quality infrastructure. When we gamble with the safety of American infrastructure, we trade the long-term structural integrity of our roads and bridges for short-term savings.

The current supply chain threat is driven by the persistent overproduction and oversupply of cement from Indonesia, Vietnam, and Bangladesh, which severely undermines U.S. industrial capacity. There is substantial evidence that these nations are intervening in markets by maintaining production levels that far exceed domestic demand. This excess material is subsequently diverted to foreign markets, including the U.S., eroding the autonomy of our own cement producers and harming America's workforce. If we lose the ability to secure a supply of high-quality, American-made cement, our national security will be fundamentally compromised.

While we applaud USTR's focus on its current investigations, it must also remain vigilant about emerging threats posed by countries such as Turkey, Egypt, and the United Arab

Emirates. In addition to taking strong enforcement action against the countries currently under investigation, we urge you to open new investigations into these countries based on their use of anticompetitive tactics to unfairly advantage their domestic cement industries at the expense of American workers and consumers.

## **Turkey**

In March 2026, the U.S. Department of Commerce determined that countervailing duties on Turkish rebar [should remain in place](#) to preserve fair competition between and guard against the risk of renewed adverse impacts on American producers from Turkish imports. The same unfair subsidization tools are available to Turkey's cement industry, which at its current production and export levels threatens to undermine American workers and consumers. Turkey has long engaged in similar predatory practices in the [steel industry](#), and its current cement production risks undercutting our ability to strengthen U.S. supply chains. Turkish cement production and [exports are surging](#), with the nation now accounting for [nearly a third](#) of all U.S. cement imports – a significant concentration that necessitates an additional Section 301 investigation into its practices.

## **Egypt**

Egypt's cement industry is structurally engineered for export-driven surplus: production surged 18% year-over-year to approximately 65 million tons in 2025, with a domestic consumption gap of over 10 million tons deliberately channeled into foreign markets, including the United States. The Egyptian government has actively subsidized and directed this expansion, granting new production licenses, providing exceptional incentives to increase factory output, and coordinating export strategy through state-affiliated industry bodies—the same market-distorting tools that led the U.S. Department of Commerce to find countervailable subsidies in Egypt's steel sector at a preliminary rate of 29.51% in January 2026. Given this established pattern of state-backed overproduction and the documented use of below-cost pricing in adjacent industries—where preliminary antidumping margins for Egyptian rebar were set as high as 52.73%—a Section 301 investigation into Egypt's cement trade practices is a logical and necessary next step to protect American producers.

## **United Arab Emirates**

The United Arab Emirates has maintained structural cement overcapacity for over a decade, with domestic demand consistently falling short of its more than 24 million tons of annual clinker production capacity, making export markets—including the United States—a deliberate pressure valve for surplus supply. In 2024, the United States was the top destination for UAE cement exports accounting for \$80.3 million in sales to American buyers, supported by state-backed industrial policy under "Operation 300bn," preferential energy pricing, and government-directed export financing that artificially lower production costs for UAE producers. The same vertically integrated state-linked companies dominating UAE cement exports—led by EMSTEEL (formerly Emirates Steel Arkan), which is publicly listed on the Abu Dhabi exchange and backed by Abu Dhabi sovereign capital—have openly pursued aggressive international market-share strategies, raising serious questions about whether their U.S. export pricing reflects true market value or policy-driven below-cost competition warranting a Section 301 investigation. While USTR's investigation is critical to addressing issues posed by foreign actors, the U.S. government must also pursue policies that address challenges in our domestic

cement manufacturing industry. This includes designating cement as a critical national security resource, subject to strategic stockpiling amid growing global instability. Additionally, the U.S. must consider implementing Buy America requirements for cement, similar to [iron and steel](#). National security starts with strong foundations, and that means ensuring every bag of cement used in our public works is manufactured right here at home.

We look forward to USTR's findings from this investigation and urge the administration to implement a comprehensive policy framework to restore fairness to the global cement market and strengthen the safeguards that protect the American workforce and our domestic industrial base.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Crim', with a small dot at the end.

**Steve Crim**  
President and Founder  
Common Sense America