



Roxanne D. Brown
International President

September 14, 2026

Via Email

The Honorable Jamieson Greer
United States Trade Representative
Washington, D.C. 20508

**RE: United Steelworkers request for the initiation of an investigation
under Section 201 of the Trade Act to limit tire imports.**

Dear Ambassador Greer:

I write to you on behalf of the 850,000 members of the United Steelworkers (USW) regarding the serious challenges facing the domestic tire industry and the need for swift action to address the continuing penetration of our market by imported tires across the entire value chain. Specifically, we urge that the United States Trade Representative (USTR) call for the initiation of an investigation under Section 201 of the Trade Act of 1974 to limit tire imports, develop relief measures that will strengthen the sector, and save domestic jobs and production.

The United Steelworkers is the primary union representing organized workers in the tire sector. These are good, family-supporting, skilled jobs that are the bedrock of the communities in which they are located. Tires are not only critical to basic personal and public transportation, but also to industrial production, agriculture, mining, and for ground vehicles and aerospace assets supporting our national security.

There are 55 tire-related manufacturing facilities in states across the country. Since 2000, domestic tire production output has declined by roughly 40 percent.¹ Since 2024 alone, we have seen plant closures impact over 7,000 workers and a decrease in domestic production as imports have eaten away at our market, while multinational firms execute long-term strategies to offshore and divest from their American workers. A list of these closures is included in a sector overview document included with this letter.

These closures inflicted significant injury on the workers, on their communities, and on our economic and national security interests. The U.S. is being targeted by

¹ [Federal Reserve Bank of St. Louis](#), "Industrial Production: Manufacturing: Nondurable Goods: Tire (NAICS = 32621)", August 18, 2026.

competitors seeking not only a foothold in our market, but as an outlet for the overcapacity they built in their own markets.

The injury inflicted on U.S. workers in the tire sector continues. Shipments from across Asia, supplemented by increasing tire imports from Mexico and elsewhere continue to displace domestic production. These shipments cover all segments of the tire industry.

USW has fought against unfairly priced imports of passenger vehicle and light truck (PVLT) tires, truck and bus (TBT) tires, and off the road (OTR) tires to fight back against the targeting of our market by the People's Republic of China (PRC), Thailand, Korea, Taiwan, India, and other countries. Those efforts will continue. The PRC has dominated the import surge as its production continues to grow. In 2000, the PRC produced roughly 100 million tires. In 2025, the PRC produced 865 million automotive tires alone with overall capacity estimated to be more than 1 billion tires. In 2009, in response to this surge, USW petitioned for the only successful Section 421 case when we sought action against surging tire imports from the PRC. When relief expired in 2012, USW pursued remedy through anti-dumping and countervailing duty (AD/CVD) cases on the PRC and successive countries as imports flooded our market.

Efforts to contain both the erosion of U.S. tire production and destruction of American workers' jobs face shifts to new jurisdictions that are not subject to AD/CVD orders and surging production that is devastating domestic production. Continued piecemeal efforts through multiple trade investigations is costly and creates uncertainty for American workers who want to see plant investments and long-term stability at work. Tires from countries like Serbia, Cambodia, Peru, and multiple other jurisdictions have surged into the U.S. market sometimes by up to 429 percent.

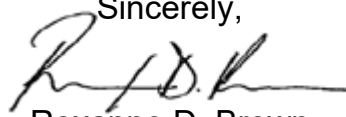
Section 201 is a powerful tool that, with the right relief measures, could stabilize the industry and fuel growth. Time is of the essence: major tire companies have closed, or are closing, facilities in several states. Investments to revitalize existing production lines is waning. Imports across the sectors are increasing, and without strong actions, outsourcing and offshoring production will accelerate.

A properly designed Section 201 initiation would cover not only passenger vehicle and light truck tires, but truck and bus tires, off the road tires, and aircraft tires. Each of these major tire segments are key to overall transportation, industrial, mining, and agricultural production and our economic and national security. Relief should include graduated import limits and measures to retain and grow production through capital costs, preferential procurement strategies, and other measures.

Attached to this letter is an overview of the current state of affairs in the tire sector and the increasing import penetration and displacement of production and jobs.

The administration has the power and the authority to act under existing law. We urge that you act quickly to stem the further loss of production and jobs. We stand ready to work with you as you assess this request and consider what relief measures would achieve our goals. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'R.D.B.', with a stylized flourish at the end.

Roxanne D. Brown
International President



Overview of the Current State of the U.S. Tire Industry

September 14, 2026

Since late 2024, 9 tire plants in the United States have fully or partially closed or announced their imminent closure. These closures have eliminated thousands of jobs and shuttered the capacity to produce millions of tires annually. Altogether, approximately 7,550 jobs have been or will be lost as a result of these closures. The plant closures have affected every segment of the domestic tire industry, including passenger vehicle and light truck (PVLТ) tires, truck and bus tires (TBT), and off-the-road (OTR) tires.

1. November 2024: Sumitomo closed its tire plant in Tonawanda, New York. The plant produced PVLТ and TBT tires as well as other types of tires, and the closure affected about 1,550 workers.
2. March 2025: Goodyear cut about 850 jobs at its plant in Danville, Virginia, that produced TBT tires.
3. April 2025: Yokohama closed its plant in Spartanburg, South Carolina. The plant produced OTR tires and employed 90 workers.
4. July 2025: Bridgestone shuttered its TBT tire plant in LaVergne, Tennessee, eliminating 700 jobs.
5. December 2025: Michelin closed its plant in Ardmore, Oklahoma. The facility, which produced PVLТ tires, employed around 1,400 workers.
6. March 2026: Yokohama closed its PVLТ tire plant in Salem, Virginia, impacting about 570 workers.
7. March 2026: Titan Tire announces that its plant in Jackson, Tennessee, will close in October of 2026. The plant produces OTR tires and employs approximately 140 workers.
8. May 2026: Goodyear announces it will be closing its plant in Fayetteville, North Carolina, by the end of 2027. The plant produces PVLТ tires and employs about 1,750 workers.
9. June 2026: Michelin announces that its PVLТ plant in Tuscaloosa, Alabama, will close by the end of 2028, affecting 500 employees.

The loss of eight plants, and the effective loss of half the Goodyear-Danville workforce, in such a short period of time is the result of an ongoing surge in tire imports from the world. These imports have seized market share from the domestic industry, depressed prices, reduced production, and eliminated thousands of jobs. The domestic industry, led by USW, has taken the lead in fighting these import surges for many years. USW successfully obtained relief from imports of PVLТ tires from China in 2009 under the China-specific safeguard. USW's efforts have also resulted in the imposition of antidumping and countervailing duties (AD/CVD) on PVLТ tires from China, Korea,

Taiwan, Thailand, and Vietnam, TBT tires from China and Thailand, and OTR tires from India.

Despite these successes, imports from the world have continued to grow, fueled by massive global overcapacity. China alone is home to more than 150 tire manufacturing plants. Chinese companies have also embarked on numerous new investments in tire production in third countries, in many cases to continue accessing the attractive U.S. market after orders were imposed on tires from China. Since 2013, Chinese companies have opened 17 tire plants in 7 countries, including Cambodia, Indonesia, Malaysia, Morocco, Serbia, Thailand, and Vietnam. The result of these irrational investments and resulting overcapacity has been a prolonged and harmful surge of U.S. tire imports from 2021 to 2025.

PVLT Tires

U.S. imports of PVLT tires from the world increased by 12.8 percent from 2021 to 2025, while demand was basically flat and estimated domestic shipments fell by 19.9 percent. As a result, imports were able to seize 7.7 percentage points of market share from the domestic industry over the period. The U.S. Tire Manufacturers Association (USTMA) estimates that domestic PVLT tire production fell by about 8 percent in 2025 alone.

PVLT Tire Imports and Shipments¹
Million Tires

	2021	2022	2023	2024	2025
Consumption	306.4	298.8	305.1	308.1	307.5
Imports	189.8	197.1	196.4	207.9	214.0
Domestic Shipments	116.6	101.7	108.7	100.2	93.5
Import %	61.9	66.0	64.4	67.5	69.6
Domestic %	38.1	34.0	35.6	32.5	30.4

TBT

U.S. imports of TBT from the world increased by 20.8 percent from 2021 to 2025, while demand was basically flat and estimated domestic shipments fell by 30.4 percent. As a result, imports were able to seize 12.1 percentage points of market share from the domestic industry over the period. The USTMA estimates that domestic TBT production fell by about 16 percent in 2025 alone.

¹ Imports are from Dataweb, imports for consumption under HTS 4011.10.10, 4011.10.5000, 4011.20.1005, and 4011.20.5010. Total shipments (consumption) are from *Tire Business*. Domestic shipments are estimated as the difference between consumption and imports.

TBT Imports and Shipments²
Million Tires

	2021	2022	2023	2024	2025
Consumption	28.9	33.2	27	29.1	29.1
Imports	17.5	23.9	17.6	19.0	21.2
Domestic Shipments	11.4	9.3	9.4	10.1	7.9
Import %	60.7	72.1	65.1	65.2	72.8
Domestic %	39.3	27.9	34.9	34.8	27.2

OTR Tires

While U.S. imports of OTR tires declined by 8.6 percent from 2021 to 2025, the domestic industry is believed to have contracted even more sharply, bearing the brunt of declining demand in the segment. OTR tires include tires for use in agriculture, construction, mining, forestry, and industrial applications, which have collectively faced headwinds in recent years. As noted above, Yokohama closed an OTR tire plant in April of 2025, and Titan Tire plans to close an OTR tire plant in October of 2026. In addition, domestic plants that remain open are believed to be operating far below capacity. Since 2024, Bridgestone's two plants, Des Moines, Iowa and Bloomington, IL, have faced several rounds of layoffs and each plant's headcount is half of what it would be at full capacity. Titan's facilities in Freeport, Illinois and Des Moines, Iowa have been operating at a reduced schedule, consistently, since the fall of 2024. Goodyear sold its OTR business to Yokohama in the summer of 2024. Since the sale, the latter company has been actively removing and boxing OTR machinery to be sent to the OTR facility it purchased in Romania after closing on the Goodyear sale. As domestic capacity has been shuttered or sits idle, imports of OTR tires are already up by 11.4 percent in the first half of 2026.

OTR Tire Imports³
Million Tires

	2021	2022	2023	2024	2025
Imports	6.7	8.9	6.3	7.0	6.1

² Imports are from Dataweb, imports for consumption under HTS 4011.20.1015 and 4011.20.5020. Total shipments (consumption) are from *Tire Business*. Domestic shipments are estimated as the difference between consumption and imports.

³ Imports are from Dataweb, imports for consumption under HTS 4011.20.1025, 4011.20.1035, 4011.20.5030, 4011.20.5050, 4011.70.0010, 4011.70.0050, 4011.80.1010, 4011.80.1020, 4011.80.2010, 4011.80.2020, 4011.80.8010, 4011.80.8020, 4011.90.1050, 4011.90.2050, and 4011.90.8050.

Aircraft Tires

U.S. imports of aircraft tires rose by 6.1 percent from 2021 to 2025, and they surged by another 20.5 percent in the first half of 2026. Imports include tires for both civil aircraft and non-civil aircraft. There are only three plants in the United States that produce aircraft tires, and additional investment is needed to ensure that the domestic industry can reliably serve domestic demand. Producers must have the ability to fully participate in the civil aircraft tire market, where imports are concentrated, in order to maintain and build the capacity needed to serve military applications. A continued surge in aircraft tire imports threatens the capabilities of this key domestic industry.

Aircraft Tire Imports^[1]
Thousand Tires

	2021	2022	2023	2024	2025
Imports	266	330	287	291	282

^[1] Imports are from Dataweb, imports for consumption under HTS 4011.30.