



November 10, 2025

William Kimmitt  
Under Secretary of Commerce  
International Trade

Jeffrey Kessler  
Under Secretary of Commerce  
Industry and Security

On behalf of the Outdoor Recreation Roundtable and the more than 110,000 American outdoor businesses we collectively represent, we want to thank you and your team for meeting with us last month and the time you spent hearing from our industry and business leaders. We deeply appreciate the time, attention, and continued engagement with our \$1.2 trillion outdoor recreation economy and the 5 million American jobs we sustain.

We greatly valued the opportunity for an open discussion and appreciated the conversation around how our industry can be a partner in strengthening U.S. manufacturing and global competitiveness. There is alignment around expanding American production capacity, supporting innovation, and ensuring our businesses can continue to thrive both at home and abroad and remain competitive for years to come.

In the meeting we shared our appreciation for the Administration's work to prevent duty-free de minimis shipments into the United States, which have undermined outdoor recreation companies and retailers. This term the administration has also ensured that there were no retaliatory tariffs on American-made boats into the EU, and EU boat import into the states now have a 15% duty improving our domestic boating industry. We also appreciated the candid conversation around the difficulties of onshoring products or adapting to new trade regulations while navigating the new impacts of tariffs on imports and reciprocal tariffs on our exports. The American recreation economy is not just a driving force in every corner of our country, it is world-renowned for our brands, vehicles, services, innovation and ingenuity as well as sustaining the American outdoor recreation experiences, which is like no other due to generations of stewardship of our public lands and waters and our businesses that support Americans exploring them.

As we continue to navigate the current trade environment, our members are committed to supporting the Administration's efforts to rebuild U.S. industrial capacity and diversify supply chains. Many are making meaningful investments in reshoring and sourcing alternatives, though certain inputs remain difficult to obtain domestically.

The existing tariffs, however, are continuing to impact both domestic producers (who rely on imported parts) and importers. We are concerned about the impact this could have on companies across the industry and their consumers. We are hopeful that current negotiations will result in lower tariffs, including lower steel and aluminum tariffs. There are also pockets of ambiguity that are causing confusion regarding how content should be calculated. Additional regulatory guidance is needed, and we urge the Department of Commerce and U.S. Customs and Border Protection to jointly issue clarifying instructions regarding: (1) acceptable methodologies for determining value content attributable to steel or aluminum; (2) how to declare origin of smelt and cast in complex, multi-tier supply chains; and (3) whether any safe-harbor thresholds or standardized declarations will be established to limit repetitive post-entry corrections. This additional guidance will help reduce uncertainty, prevent inadvertent non-compliance, and improve uniformity of reporting across the trade community.



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As noted in our meeting, the outdoor recreation industry depends on a balanced trade environment and one that encourages domestic production and responsible sourcing while maintaining access to the components and materials needed to meet consumer demand. These realities underscore the importance of continued communication and collaboration to find balanced approaches that sustain U.S. growth and employment while maintaining global competitiveness. We discussed a few immediate areas where the Administration could support our industry in general and within each sector of the outdoor recreation economy in its efforts to ensure our American products remain globally competitive and services are utilized by international travelers. Please see the attached Addendum for these segment-specific examples.

As we approach the 250<sup>th</sup> anniversary of America next year and celebrate all that makes our nation great, we hope that our Great Outdoors will be an area of focus and the American Recreation Economy an area of strength. To get there, we look forward to continuing this dialogue and exploring opportunities for partnership, whether through engagement around trade deals like USMCA, manufacturing roundtables, contributing to data and case studies from our sector, or connecting your teams with outdoor recreation manufactures who exemplify U.S. innovation and leadership and those trying to onshore but in need of support. We are eager to continue advancing policies that bolster domestic production, expand export potential, and strengthen the outdoor recreation economy as a key pillar of American prosperity for the next 250 years.

Sincerely,

Jessica Turner  
President  
Outdoor Recreation Roundtable



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## ADDENDUM

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### **Biking**

The U.S. bicycle industry is working with partners in Congress to increase domestic assembly and production as well as incentivize supply chains to move to the United States. The proposed Section 232 request for inclusions for steel and aluminum tariffs, however, could have a significant impact on bicycle companies, including existing domestic manufacturers and small retailers across the country.

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### **Gear and Equipment**

#### **Increased Costs for Gear and Equipment**

Many outdoor products, like bike frames, and tent poles, contain steel or aluminum components. The inclusion of more derivative products under Section 232 tariffs (now up to 50%) will raise import costs, which could be passed on to consumers

#### **Compliance and Traceability Burden**

Companies must now trace and report the origin and metal content of components, even if steel or aluminum makes up a small fraction of the product. This adds administrative complexity and risk of penalties for non-compliance.

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### **Horseback Riding**

Tariffs have had a significant impact on communities that depend on the horse industry, especially on essential items such as feed, bedding, supplements, veterinary pharmaceuticals, breeding equipment, riding apparel, horse trailers, and safety gear (helmets and protective apparel). Certain goods, such as handmade saddles crafted by artisans with generations of experience, cannot be easily replicated domestically.

Importing horses for both temporary purposes, such as travel for international competition, and permanent sales horses has created a barrier because of financial requirements like temporary import bonds and carnets add thousands of dollars in costs to athletes, breeders, and event organizers working to showcase American excellence on the world stage, leaving U.S. competitors at a disadvantage. New tariffs on horses are creating a barrier for many throughout the industry.

Providing tariff relief could reduce the impact on this industry and the communities that depend on it.

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### **RV**

On behalf of the American recreation vehicle industry, which supports nearly 680,000 jobs and pays more than \$48 billion in wages, we ask that Indonesian lauan plywood (HTS 4412.31.45 and

4412.31.48) be excluded from IEEPA reciprocal tariffs by restoring it to Annex II. This correction aligns with existing Annex III recognition of HTS 4412.31 products, avoids punishing U.S. manufacturers with no domestic alternatives, and ensures IEEPA reciprocal tariffs remain targeted at the existing Annex III recognition of HTS 4412.31 products, avoids punishing U.S. manufacturers with no domestic alternatives, and ensures IEEPA reciprocal tariffs remain targeted at bad-faith international actors—not at allies or bad-faith international actors—not toward allies and critical inputs into U.S. manufacturing.

Lauan plywood imports serve a market that domestic producers have been unable or unwilling to service, and do not displace or harm domestic plywood production. Making this product subject to IEEPA reciprocal tariffs imposes significant harm on the entire RV industry, which heavily depends on this product for U.S. manufacturing and is unable to secure a viable alternative anywhere else in the world. It is also extremely unlikely to lead to an expansion of U.S. plywood production for meranti (lauan) or other tropical logs, as domestic producers have consistently stated, even under oath during the China investigations, that they do not produce thin-faced veneers and do not compete with Indonesia.

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## **Snowsports**

This industry is seeking the following exemptions for consideration:

### **Section 232 Derivative:**

#### **Alpine Skis 9506.11.4080**

These products fall under the Section 232 derivative list, which interestingly does not include Nordic skis or snowboards which generally share the same materials. We're unclear on the rationale for singling out one specific type of ski, especially given that the amount of steel in an alpine ski is nominal. With the impacts of climate change and inconsistent winters already presenting a challenge to the US winter sports industry, increasing the price of alpine skis because their steel content unfairly targets local retailers and US consumers.

#### **Jackets 6101, 6012**

#### **Gloves 6116.10.08**

Winter outdoor jackets and gloves are highly technical products, designed to protect users in extreme cold conditions. This specialized expertise has been developed over decades in partnership with overseas factories, knowledge and capabilities that the U.S. workforce currently does not possess. Furthermore, with these products now subject to heavy tariffs, their prices have risen well beyond the reach of everyday Americans, creating not just an affordability concern and a threat to local retailers, but a safety issue.

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## **Sportfishing**

The sportfishing industry is requesting that HTS codes that begin with 9507, which covers many of the fishing reels, rods and nets that are used by hardworking American citizens who like to enjoy time



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fishing with family and friends, should be excluded from future tariffs as the cost is passed on to these American families.

Also, if there isn't relief on these tariffs, then any products that are subject to the Dingell-Johnson Act of 1950, or the Sportfish Restoration Act, should be allowed to exclude tariffs when calculating Federal Excise Taxes. For 75 years, companies have been willing to pay FET because it's the right thing to do for conservation, but as tariffs increase the cost of the product at import, companies are being double taxed because the FET is being added AFTER the tariff has been added. Companies shouldn't be penalized for paying a conservation tax, but that is essentially what tariffs are doing.