April 15, 2026

The Honorable Jamieson Greer
United States Trade Representative
600 17th Street, NW
Washington, DC 20508

RE: USTR-2026-0067: Section 301 Investigation on Structural Excess Capacity and Production in Manufacturing Sectors

Dear Ambassador Greer:

The Exhibitions & Conferences Alliance (ECA), a coalition of the leading professional and trade associations from across the U.S. business and professional events industry, appreciates the opportunity to submit these comments regarding the Office of the United States Trade Representative's (USTR) Section 301 investigation into structural excess capacity and production in manufacturing sectors.

The U.S. business and professional events industry is America's small businesses helping America's small businesses. More than 99 percent of all business events companies are small businesses, and 80 percent of the 1.7 million exhibitors at events nationwide are U.S. small businesses[1].

Every day, exhibitions, meetings, conferences, expositions, trade shows, and more attract exhibitors, attendees, and buyers from around the world to share knowledge and conduct business here in the U.S. These events help drive economic growth, support job creation, and empower small businesses by expanding market access for their goods and services. Each year, 46 percent of U.S. small businesses exhibit at business and professional events to help grow their businesses.[2] In addition, these events drive demand for restaurants, hotels, travel services, and Main Street commerce in all 50 states.

In 2025, our industry employed 2.63 million Americans and drove $426.1 billion in spending across the U.S.[3] That said, trade-related uncertainty has weakened cross-border travel and negatively impacted international exhibitor, attendee, and buyer participation at many U.S. events. Recent data underscore this trend. International visits to the U.S. declined by approximately 5.4 percent in 2025, even as global travel demand increased.[4] Arrivals from key markets, including Canada, fell significantly, with vehicle arrivals declining by more than 30 percent and air arrivals also decreasing by 8 percent.[5]

---

[1] Go LIVE Together, *Business Events Industry Overview* (February 2021).
[2] Go LIVE Together, *Business Events: Defined* (March 2021).
[3] Events Industry Council, *Global Economic Significance of Business Events* (October 2023).
[4] United Nations, *UN Tourism Data Dashboard* (February 2026).
[5] Statistics Canada, *International Travelers Entering or Returning to Canada* (February 2026).

Early indicators suggest continued softness in 2026, with international inbound travel remaining below expected levels and lagging global growth trends.[6] As a result, U.S. event organizers, venues, suppliers, and small business exhibitors are facing increasing challenges to their competitiveness.

Within that context, ECA opposes the imposition of new tariffs under this investigation into structural excess capacity and production in manufacturing sectors. While ECA recognizes the importance of addressing unfair trade practices and structural distortions in global markets, news tariffs would have significant unintended consequences for downstream industries such as the U.S. business and professional events sector.

The business and professional events industry depends on a complex global supply chain of materials, equipment, and services. Tariffs on key inputs directly increase costs for event organizers, service contractors, exhibitors, and venues. These inputs include, but are not limited to, structural metals and fabricated components used in exhibit construction, lighting and audiovisual equipment, flooring systems, and furnishings. Tariffs applied to these categories directly increase the cost of producing and delivering events in the U.S.

These increased costs are ultimately passed on to small businesses and attendees, reducing participation and limiting economic activity. Recent industry data show that 76 percent of exhibitors experienced tariff-related cost increases in 2025, with 50 percent seeing cost increases of 10 percent or more.[7] Further, 74% of exhibit suppliers passed some or all their increased production and sourcing costs onto their small business exhibitor customers.[8] As a result, 40 percent of small business exhibitors are planning to reduce their event participation in 2026.[9]

Importantly, in many cases there are no viable domestic alternatives for the materials and inputs required by our industry. Event suppliers rely on specialized components for exhibit construction, staging, and production that are not manufactured in the U.S. at the necessary scale or specification. Even where domestic production exists, suppliers frequently encounter minimum order requirements or volume thresholds that do not align with the project-based needs of the events industry’s small businesses.

For example, U.S. steel and aluminum producers often prioritize large-volume buyers and decline to fulfill smaller orders typical of event production projects. This limits access to domestic supply for event service providers. As a result, companies are forced to rely on international suppliers not by choice, but by necessity. Under these conditions, tariffs do not incentivize reshoring or domestic substitution. Instead, they function as a tax on U.S.

---

[6] Tourism Economics, *U.S. Travel Forecast Update* (March 2026).
[7] EXHIBITOR Magazine, 2025 *Tariff Impact Survey* (February 2026).
[8] *Ibid*.
[9] *Ibid*.

companies, particularly small businesses, without providing a viable alternative. Tariffs like these that raise the cost of participation quickly translate into fewer exhibitors, reduced event scale, and diminished economic impact in host communities from coast to coast.

The effects extend beyond costs alone. U.S. business and professional events operate in a highly competitive global environment. Organizers compete directly with international destinations to attract events and investment. Rising costs and policy uncertainty make it more difficult for U.S.-based events to compete, particularly at a time when other countries are actively investing in attracting events and reducing barriers to participation.

At the same time, international participation in U.S. events is already under pressure. Declines in inbound travel are reducing the pool of international exhibitors and attendees. Because international participants account for a disproportionate share of spending—international attendees at U.S. events spend $11,600, while international exhibitors spend $36,100[10]— even modest declines can have outsized economic effects. Tariffs that further increase costs or reduce confidence in the U.S. as a destination will accelerate this trend.

For these reasons, ECA respectfully urges USTR to refrain from imposing broad-based tariffs due to structural excess capacity and production in manufacturing sectors that increase costs for downstream service industries without providing viable domestic alternatives. ECA also encourages USTR to consider targeted exclusions for materials and inputs where domestic production is limited or unavailable, as well as engage directly with affected industries like ours to better understand the real-world impact of new tariffs on American small businesses.

The U.S. business and professional events industry plays a critical role in supporting U.S. small businesses, facilitating trade, and driving economic growth and opportunity across the country. Tariffs that increase costs, reduce international participation, and undermine the competitiveness of our industry ultimately weaken these benefits.

ECA appreciates the opportunity to provide these comments and would welcome the opportunity to provide additional information or connect USTR with industry stakeholders who can share further stories and insights. Thank you for your consideration.

Sincerely,

Thomas F. (Tommy) Goodwin
President and Chief Executive Officer

---

[10] Center for Exhibition Industry Research, *CEIR Index Report* (April 2010).