June 3, 2025

Hon. Howard W. Lutnick
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

RE: Comments on Section 232 National Security Investigation of Imports of Commercial Aircraft and Jet Engines and Parts for Commercial Aircraft and Jet Engines [Docket No. 250509–0082]

Dear Secretary Lutnick,

The National Agricultural Aviation Association (NAAA) respectfully submits these comments to the Department of Commerce (Commerce) in response to the request for public comments on the national security investigation of imports of commercial aircraft and jet engines and parts for commercial aircraft and jet engines under Section 232 of the Trade Expansion Act of 1962, as amended.[1]

NAAA represents the interests of the 1,560 aerial application industry owner/operators and 2,028 non-operator agricultural pilots throughout the United States licensed as commercial applicators that use aircraft to enhance the production of food, fiber and bio-energy; protect forestry; protect waterways and ranchland from invasive species; and provide services to agencies and homeowner groups for the control of mosquitoes and other health-threatening pests.

Within agriculture and other pest control situations, manned aerial application is an important method for applying pesticides, for it permits large areas to be covered rapidly—by far the fastest application method of crop inputs—when it matters most. It takes advantage, more than any other form of application, of the often too-brief periods of acceptable weather for spraying and allows timely treatment of pests while they are in critical developmental stages, often over terrain that is too wet or otherwise inaccessible for terrestrial applications. It also treats above the crop canopy, thereby not disrupting the crop and damaging it. Aerial application has greater productivity, accuracy, speed, and is unobtrusive to the crop compared to ground application. Although the average aerial application company is comprised of but six employees and two aircraft, as an industry these small businesses treat nearly 127 million acres of U.S. cropland each season, which is about 28% of all cropland used for crop production in the U.S. In addition to the cropland acres, aerial applicators annually apply to 5.1 million acres of forest land, 7.9 million acres of pasture and rangeland, and 4.8 million acres for mosquito control and other public health concerns. Research from Purdue University found that yield loss from ground sprayer wheel tracks varied from 1.3% to 4.9% depending on boom width. While this study was conducted in soybeans, similar results could be expected in other crops as well. Data from a Texas A&M University economics study found that the value in additional crop yield that the aerial application industry brings to farmers, input suppliers, processors, and agricultural transportation and storage industries for corn, wheat, cotton, soybean, and rice production in the U.S. is estimated to be about $37 billion. The Texas A&M4 study revealed that the total area of cropland needed to replace the yield lost if aerial application was not available for corn, wheat, soybean, cotton, and rice production is 27.4 million acres, an area roughly the size of Tennessee. Aerial applicators also seed 3.8 million acres of cover crops annually. This means

[1] *Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Commercial Aircraft and Jet Engines and Parts for Commercial Aircraft and Jet Engines*, 90 Fed. Reg. 20273 (May 13, 2025) (Docket No. BIS-2025-0027; XRIN 0694-XC127).

that aerial applicators are responsible for helping to sequester 1.9 million metric tons of CO2 equivalent annually, which according to the EPA would be the equivalent of removing approximately 412,000 cars with carbon-combustion engines from the roads each year.

NAAA is proud to be part of the U.S. aerospace industry, which has been synonymous with ingenuity, prosperity, and technical superiority. General aviation, of which agricultural aviation is part of, contributes significantly to the U.S. economy. Including direct, indirect, induced, and enabled effects, general aviation supported 1.3 million jobs, generated $107.5 billion in labor income (including wages and salaries and benefits as well as proprietors' income), and produced $339.2 billion in economic output.[2] On the trade front, the U.S. aerospace industry had a net positive export trade balance of $104 billion in 2024, with exports of $124 billion and imports of just $20 billion. This is the result of significant investments throughout the U.S. economy and the sector plans to grow and further build out its U.S.-based manufacturing supply chain in the years to come. Two of the largest agricultural aviation aircraft manufacturers in the world are Air Tractor in Olney, Texas, and Thrush in Albany, Georgia. Today, Air Tractor sells more single engine turboprop aircraft globally than any other general aviation aircraft manufacturer. Over 81% of the U.S. agricultural aircraft fleet are propelled by turbine engines and the large majority of those engines and accompanying parts are manufactured by Pratt & Whitney Canada headquartered in Longueuil, Quebec.

As Commerce conducts its investigation into imports of commercial aircraft, engines, and parts, NAAA urges it to consider the impact tariffs could have on the aerospace sector. Until recently, the industry has operated under the terms of the Agreement on Trade in Civil Aircraft. Under this agreement, signatories adopted U.S.-led global norms, harmonized regulations, and eliminated tariff and non-tariff barriers on civil aircraft, engines, flight simulators, and parts and components for civil aircraft. The stability created by this Agreement has been critical for the success of the U.S. ag aviation industry in terms of jobs, investments, lower food prices and exports to many countries.

With that in mind, NAAA respectfully urges Commerce to refrain from imposing new tariffs, uphold tariff-free commitments in the Agreement on Trade in Civil Aircraft and fortify them in bilateral agreements, and work with the aerospace industry to find ways to further expand America's leading manufacturing export position through workforce investment, certification and regulatory improvements, and other measures. As the Administration conducts its Section 232 investigation into commercial aircraft, jet engines, and parts, NAAA believes that this approach offers the best way to strengthen U.S. national and economic security.

Should you have any questions about this submission, please don't hesitate to contact me.

Most sincerely,

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[2] Contribution of General Aviation to the US Economy in 2023, PricewaterhouseCoopers (February 2025), p. 1, available here: https://gama.aero/wp-content/uploads/General-Aviations-Contribution-to-the-US-Economy_Final_021925.pdf.