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Office of Strategic Industries and Economic Security
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Avenue, NW
Room 3876
Washington, D.C. 20230

Subject: Comments in Response to Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Wind Turbines and Their Parts and Components

Deputy Assistant Secretary Robby S. Saunders,

Thank you for the opportunity to provide input on the Department of Commerce's request for comments in the Section 232 national security investigation of imports of wind turbines and their parts and components. The National Ocean Industries Association (NOIA) is the voice and advocate for America's offshore energy industry, including offshore oil and gas, offshore wind, offshore carbon sequestration, and deep sea mining. The full offshore energy sector serves to fortify and advance the national security interests of the country.

For more than 50 years, NOIA has represented the interests of all segments of the offshore energy industry, including offshore oil and gas, offshore wind, offshore carbon sequestration, and offshore minerals. Our membership includes energy project operators, leaseholders, and developers along with the entire supply chain of companies that make up an innovative ecosystem contributing to the safe and responsible exploration, development, and production of U.S. energy and mineral resources.

As explained in detail in this submission, the offshore wind sector is critical to U.S. national security. Tariffs imposed on wind turbines and their parts would impede the growth of this critical sector and create new national security risks. For this reason, we urge the administration not to impose any additional tariffs on wind turbines and their parts in connection with this investigation.

Retired Army General James "Spider" Marks, the senior intelligence officer for the 2003 liberation of Iraq and the former commanding general of the U.S. Army Intelligence Center, underscored the positive national security impacts of our offshore wind industry:

America needs a strong offshore wind energy industry in order to compete with China. According to data from Statista, China currently operates 129 offshore wind farms — the most of any country — and much higher than the 4



wind farms operating here in the United States. By dwarfing our domestic energy projects, China is well positioned to withstand global supply shocks and power its military growth and modernization — which will only grow unless our country makes the necessary investments.

As a retired soldier with over three decades of experience in service to this great nation, I can speak thoroughly to the fact that energy security is national security. Renewables are an important part of our energy mix as they allow for a diversified grid that does not rely solely on sources like diesel, natural gas, nuclear power or even solar.

Access to reliable, sustainable and affordable energy is key to America's functioning economy, military and society. Our national resilience and geopolitical standing rely on it. Impeding American offshore wind capabilities counters the very goals Trump campaigned on and would create a hole in our energy arsenal that can be filled domestically.¹

Offshore wind improves our national security by shifting economic, infrastructure, and geopolitical advantages to the U.S. through increased shipbuilding, enhancements to our ports, greater energy security to power surging electricity demand, more manufacturing and good-paying jobs, additional business for the oil and gas supply chain, and collaborative opportunities for our military. In short, offshore wind helps the U.S. achieve its energy dominance goals. While this investigation focuses on the impacts of imports on our national security, any analysis must first and foremost consider the overall national security benefits of the establishment and maintenance of the industry itself. Without competitively priced imports, the U.S. offshore wind sector would become less viable. Thus, price increases spurred by tariffs on offshore wind-related components would threaten our domestic industry and compromise U.S. national security. These results would be the exact opposite of the stated goals of the administration's trade policy, *i.e.*, expanding the U.S. industrial base, creating opportunities for American workers, and strengthening our national security. For these reasons, the administration should refuse to impose tariffs on wind turbines and their components as a result of this investigation.

The Offshore Energy Industry Is Advancing Energy Solutions in Offshore Oil and Gas and Offshore Wind

The offshore energy sector is a proven leader in solving energy challenges and delivering diverse sources of energy to the global economy. The offshore industry brings together the companies that produce foundational energy sources such as oil and gas, while leading innovation and investment in energy sources and technologies that will power the grid and fuel our economy into the future. The offshore energy sector has unparalleled expertise and experience deploying and scaling technologies at

¹ <https://www.stripes.com/opinion/2025-03-04/offshore-wind-national-security-imperative-important-opinion-17032728.html>



levels necessary to meet growing U.S. and global demand, including surging demand for electricity.

Many of the same companies that built the offshore oil and gas sector in the Gulf of America are now participating in the build-out of the offshore wind sector in the Atlantic. This includes many service and supply companies along the Gulf Coast and beyond, who have expertise in marine construction, fabrication, subsea engineering and design, and offshore vessel services. In short, our members are in the business of making energy happen in the maritime environment, and this includes both offshore oil and gas and offshore wind.

A Robust Offshore Wind Sector Increases Domestic Shipbuilding – Vital to Our National Security

President Trump’s Executive Order on Restoring America’s Maritime Dominance (April 9, 2025) prioritizes the revitalization of U.S. shipbuilding as a national security imperative. Offshore wind is delivering exactly that—expanding the U.S. shipbuilding industry by restoring our industrial base and supporting the domestic maritime workforce with real, shovel-ready projects. Broad-based tariffs on goods critical to the offshore wind industry would hamper the beneficial impact of offshore wind on U.S. shipbuilding.

Consistent with President Trump’s Executive Order, offshore wind has emerged as one of the fuel sectors driving a shipbuilding renaissance in the U.S., helping to revitalize American shipyards and supporting thousands of skilled maritime jobs. Gulf Coast shipyards, long central to oil and gas vessel construction, are now seeing new demand for specialized wind vessels.

- Edison Chouest Offshore (LA) is constructing multiple Jones Act-compliant vessels, including the ECO Edison, the first U.S.-built Service Operation Vessel (SOV) for offshore wind.
- Candies Shipbuilders (LA) has completed critical vessel retrofits and specialty barges.
- Metal Shark Boats (LA) and Breaux Brothers Enterprises (LA) are producing next-generation Crew Transfer Vessels (CTVs) for American Offshore Services and other providers.
- Bollinger Shipyards (MS & LA) is building hybrid feeder barges and tugboats to support Maersk's innovative turbine installation system for Empire Wind.

Offshore wind helps bridge gaps in commercial demand, especially for Gulf Coast shipyards that have traditionally served offshore oil and gas. This partnership:

- Smooths boom-bust cycles for energy and shipbuilding firms.
- Keeps fabrication yards and welders working year-round.
- Supports diversification of energy companies and supply chains rooted along the Gulf of America.



U.S. Vessels Are Being Built in U.S. Shipyards²:

- 35 vessels have already been completed for the U.S. offshore wind market—23 are newbuilds, and 12 are retrofits.
- 23 more vessels are under construction or announced, with more than \$1.8 billion in vessel orders and \$12.2 million in shipyard upgrades already tracked.
- The ECO Edison alone supported 600 jobs across Louisiana, Mississippi, and Florida, with a supply chain touching 30 states and major components sourced from Texas, Alabama, North Carolina, and Ohio.
- Charybdis, the first U.S.-built Wind Turbine Installation Vessel (WTIV), being constructed in Brownsville, TX, is a \$715 million investment supporting 1,200+ jobs.

Offshore wind vessel construction drives investment and job creation far from project sites. For example, these projects source:

- Steel from Alabama, Texas, and North Carolina.
- Engines and controls from Indiana, Georgia, and Ohio.
- Fabrication and components from Wisconsin, Illinois, Pennsylvania, and more.
- Shipyard jobs in Louisiana, Rhode Island, Florida, Texas, Mississippi, and Wisconsin.

Continued growth in offshore wind development gives the U.S. a strategic opportunity to compete—not by outsourcing—but by investing in American yards, workers, and supply chains. Building up our own commercial fleet strengthens national resilience and shores up critical infrastructure. All of these benefits would be put at risk by tariffs on offshore wind-related goods.

Offshore Wind Provides Greater Energy Security to Power Surging Electricity Demand – Vital to Our National Security

America is entering a new era of energy demand—driven not just by population and industrial growth, but by the explosive rise of artificial intelligence, data centers, and advanced manufacturing. Offshore wind stands out as a scalable, domestic solution capable of meeting this challenge while strengthening energy security and economic competitiveness.

The stakes are clear:

- U.S. power consumption by data centers alone is projected to account for nearly half of all electricity demand growth by 2030.
- Individual AI data centers can require as much electricity as a small city—or even a small country.
- Global energy demand for AI infrastructure could quadruple by 2030, according to leading forecasts.

² <https://www.noia.org/offshore-wind-powering-a-comeback-for-american-shipbuilding/>



In response, the U.S. government has made AI energy infrastructure a national priority:

- The January 2025 "Stargate Initiative" committed \$500 billion over four years to accelerate AI infrastructure.
- Executive Orders followed to support coal (April 2025) and nuclear (May 2025) development to ensure energy reliability for AI.
- A January 2025 directive established it as U.S. policy to maintain global leadership in artificial intelligence—explicitly linking digital dominance with energy infrastructure.

What is needed is a broader portfolio of domestic energy sources, with offshore wind offering a compelling path forward. With 14 GW of offshore wind capacity under development and 5 GW of commercial-scale projects currently under installation, the U.S. offshore wind sector is poised to play a major role in powering the digital economy.

Offshore wind is **scalable**:

Utility-scale projects can bring large volumes of energy online.

Offshore wind **powers the tech boom**:

Projects can feed into burgeoning IT demand centers—in areas where AI, tech, and manufacturing hubs are growing fastest.

Offshore wind is **reliable and predictable**:

Offshore wind has high capacity factors and provides consistent wind generation patterns to provide baseload energy and to complement other forms of energy.

Offshore wind is **additive**:

It strengthens the U.S. grid without displacing existing energy sources—supporting coal, nuclear, gas, and renewables in tandem.

The Gulf of America is leading the charge—applying its world-class offshore engineering, shipbuilding, and logistics capabilities to support America’s offshore wind buildout. This is not only helping to meet urgent energy demand, but also reindustrializing U.S. ports and shipyards and fortifying domestic supply chains critical to energy resilience and national competitiveness. As AI reshapes the economy, America must ensure it has the energy to power it. Offshore wind is a strategic asset in that mission—fueling the data-driven future while delivering jobs, reliability, and long-term affordability.

Section 232 tariffs on offshore wind turbines and components would slow the growth of the offshore wind sector and limit the ability of offshore wind to support American AI leadership.



The Offshore Wind Industry Drives Enhancements to U.S. Ports – Vital to Our National Security

Port investments for offshore wind are substantial, with billions in public and private funds already committed. Billions more are needed, however, particularly for specialized ports capable of manufacturing, assembly, and maintenance. The offshore wind industry can play a key role in unlocking these investments, which will generate local economic benefits, including job creation and a stronger domestic supply chain. Key areas for investment include expanding port capacity, improving logistics, and upgrading infrastructure to support the manufacturing and installation of large offshore wind components. Section 232 tariffs on offshore wind components will slow growth in the industry, removing the incentives driving these critical investments in U.S. ports.

Ports serve as the essential base for offshore wind projects, acting as centers for manufacturing, assembling, and marshaling large components like turbine blades and foundations before they are transported to sea. Ports are necessary for local manufacturing facilities, enabling the U.S. to build its own supply chain and reducing reliance on imported parts. Once wind farms are operational, ports will serve as operational hubs for maintenance crews and support vessels. Investments in port infrastructure create significant jobs in manufacturing, construction, and operations. Port development helps establish and expand a domestic supply chain for offshore wind components, creating supplier opportunities. The upgrading of ports by the offshore wind industry will additionally serve to revitalize waterfront communities, bringing new commerce and opportunities to these areas. These investments have enhanced – and will continue to enhance – America’s national security interests because upgrades in capacity, logistics, and infrastructure of ports serve all components of our economy and defense.

At this point, twenty-five U.S. ports are already participants in offshore wind or are in the development stage of becoming key hubs for the industry, accounting for more than \$5 billion in investments. Port investments in offshore wind are taking place around the entirety of the U.S. coastline, including Atlantic, Pacific, and Gulf Coast regions. Much more investment is on the way if the industry has the regulatory pathway for continued development, with estimates that 75 more port development sites and \$36 billion will be necessary to support the industry over the next ten years.³

Tariffs on critical industry inputs would put all of the progress—and the associated national security benefits—at risk.

Offshore Wind Generates Additional Business Opportunities for U.S. Companies Serving the Oil and Gas Industry – Vital to Our National Security

America’s offshore wind industry is scaling up rapidly, offering a generational

³ <https://oceantic.org/offshore-energy-at-work/>



opportunity to strengthen domestic energy production, create high-quality jobs, and diversify the nation's maritime and industrial supply chains. At the center of this momentum are companies from the Gulf of America—many of which built their reputations in offshore oil and gas and are now applying decades of offshore engineering, construction, and logistics expertise to wind energy.

- The Gulf region's companies are not just participating in offshore wind—they're building it. From project development and installation to supply chain logistics and workforce training, Gulf-based firms are driving U.S. offshore wind deployment on both coasts.
- Subsea 7 and Oceaneering—leaders in subsea engineering—are leveraging their expertise to support turbine foundation installation and subsea cable work.
- Gulf Island Fabrication and Kiewit Offshore Services, known for building oil and gas platforms, have invested in and built up their fabrication yards to support offshore wind structures, such as turbine foundations and substations.
- Keystone Engineering designed the first U.S. offshore wind turbine foundation at the Block Island Wind Farm and continues to play a key role in new projects.
- Falcon Global is deploying marine construction equipment originally designed for energy exploration to support offshore wind installation and heavy lift work.

These examples of companies' involvement reflect the Gulf's unique capability: adapting proven industrial know-how to meet the demands of emerging offshore wind markets, creating new opportunities without reinventing the wheel. Furthermore, many Gulf Coast vessel companies that have been built upon a foundation of decades of work in offshore oil and gas are now recipients of extensive contracts in support of offshore wind projects in the Atlantic. These companies have taken on risk – in a calculated way based upon the traditional stability in the U.S. regulatory system – by investing capital in Atlantic offshore wind operations. Broad-based tariffs on goods critical to the industry's growth would put these investments and these companies' new business opportunities at risk.

Offshore Wind Supports U.S. Manufacturing and Creates Good-paying American Jobs – Vital to Our National Security

Offshore wind is a newer industry in the U.S., but it has been long planned. The sector has already entered into 2,000 supplier contracts across 40 states that are putting thousands of Americans to work, attracting more than \$25 billion in new investments in vessel construction, transmission upgrades, port revitalization, manufacturing expansion, research advancement, and workforce training.⁴

⁴ <https://oceantic.org/offshore-energy-at-work/>



As with any industry that is emerging in a new region, the offshore wind industry is gradually building its manufacturing presence in the U.S. As a global industry, similar to offshore oil and gas, manufacturing bases for unique components are located throughout the world in order to most efficiently serve the industry. However, for purposes of overall cost-effectiveness, the supply chain for the U.S. offshore wind industry is being substantially built up here, with billions of investments being made within the American market.

The U.S. manufacturing base for offshore wind products continues to expand, but it will be years before sufficient U.S. capacity exists to completely support U.S. demand. As a bridge during this period, it is critical that the industry maintains its access to critical products that—for now—are not available domestically. Tariffs on these goods – sourced primarily from our allies in Europe and North America – will stunt the growth of the U.S. offshore wind industry, decreasing the incentive to invest in the growth of the U.S. manufacturing base for these products.

Crucially for our national security, the U.S. steel industry is getting a big boost from the development of the offshore wind industry. This includes steel mill expansions in Texas, Kentucky, and Ohio, and new plants in Virginia and Maryland. On top of that, the industry has built up manufacturing of subsea high-voltage cables, monopiles, suspended internal platforms, and more. Overall, the offshore wind supply chain has experienced more than \$25 billion in investments here in the U.S.

A Strong Domestic Offshore Wind Industry Helps the United States Compete Globally – Vital to Our National Security

Offshore wind is an opportunity to continue to bring more and more of the supply chain to the U.S., reinvest in maritime manufacturing, and anchor energy security in U.S. ports, shipyards, and fabrication yards. Fortunately, turbines installed in the U.S. are coming from the U.S. or trade partners. Imports for specialized offshore wind components primarily come from Europe and North America.

By continuing to scale up, offshore wind:

- Revitalizes shipbuilding and heavy manufacturing, especially in the Gulf of America
- Aligns with bipartisan goals to “Make It In America Again” and restore national industrial strength
- Strengthens domestic supply chains critical to energy, transportation, and national defense

America’s initial progress in offshore construction, marine engineering, and shipbuilding gives the U.S. a powerful head start—but only if we lift restrictions on the industry. Any new restrictions, including Section 232 tariffs on critical inputs, would slow the growth of the domestic industry and cede leadership in this key sector to geopolitical rivals such as China, which has emerged as the global leader in offshore wind energy production. A strong, American-made offshore wind sector



helps ensure that energy technologies of the future are built in the U.S.

Continued Collaborative Opportunities for Our Military – Vital to Our National Security

Offshore wind provides a unique opportunity for positive collaboration among the Department of Defense, the Department of the Interior, and the offshore wind industry to promote offshore wind infrastructure as a strategic asset for the country. The industry is already working in a collaborative manner with the federal government to ensure compatibility with our national security interests. The Department of Defense (DoD) Siting Clearinghouse has been established as the primary channel for reviewing offshore wind projects for potential impacts on military operations. It provides a formal review process to ensure a project's compatibility with military training, testing, and readiness throughout the planning and development stages. The Clearinghouse's evaluation for offshore wind projects specifically focuses on several areas of military readiness, including aviation, training and testing, line of sight, and equipment impacts. Offshore wind developers engage early on with the Clearinghouse in order to: identify and resolve potential conflicts with the DoD early in the planning process; prevent complications that could cause significant, project-threatening delays during the formal permitting phase; and develop technical solutions to mitigate potential impacts, ensuring the project can coexist with national security interests.

Beyond the current collaboration, offshore wind provides a unique opportunity in our global competition for energy *and* military dominance. There has been dramatic growth in offshore wind development in regions throughout the world: in Europe around the North and Baltic Seas; in East Asia around China; in South America around Brazil; and in Southeast Asia around Vietnam and the Philippines. Countries around the world are clearly embracing offshore wind as a means of shoring up national security. For example, Brazil is planning a build-out of offshore wind to strengthen its long-term energy security. Also, China's offshore wind farms are located in areas significant to its own national security, concentrated along its eastern and southern coastlines. In fact, there has been substantial growth in China's offshore wind industry in the vicinity of the South China Sea. China clearly views its offshore wind industry as a key pillar of its economic, energy, and national security. As part of China's embrace of offshore wind, it presumably – and necessarily – is addressing the same military readiness issues that arise within the U.S. market. With the greatest military force in the history of the world, we have an opportunity to place ourselves on equal footing – or better – with China, so that we are well positioned to train, navigate, manage, and engage militarily in global regions characterized by offshore energy infrastructure.

Furthermore, the Department of Defense and the industry can continue to partner to examine ways to deploy offshore energy infrastructure for the benefit of our national defense. For example, offshore wind farms can benefit national defense by hosting surveillance equipment that enhances maritime domain awareness. The same surveillance systems that are in place to protect offshore wind farms can provide early



warnings against threats to other maritime and coastal assets, improving response times for law enforcement and military agencies. Over time, advanced technologies like infrared cameras, AI, and integrated sensors on turbines can improve the monitoring of coastal areas and critical infrastructure. Beyond the military, offshore wind farms can also contribute to civilian maritime safety. Partnerships with agencies like the U.S. Coast Guard can use the infrastructure to improve search and rescue tools with real-time meteorological and oceanographic data from wind farms.

The future of offshore wind and national defense points toward a collaborative relationship where wind farms are not simply components of our energy system but active elements of a maritime surveillance network. By adopting advanced, integrated security measures, offshore wind can become a strategic national asset. For these reasons, the U.S. Government should continue to foster engagement with the domestic offshore wind industry, while avoiding the imposition of tariffs that would slow the growth of the sector and prevent broader collaboration.

Conclusion

Thank you for the opportunity to provide comments on the Department of Commerce's request for comments on the Section 232 national security investigation of imports of wind turbines and their parts and components. The offshore wind sector has served – and should continue to serve – as an important booster and strategic component of our national security interests. Section 232 tariffs on wind turbines and their parts would put the entire industry, and its attendant national security benefits, at risk. For these reasons, we urge the administration to refuse to impose tariffs on critical inputs for our industry as a part of this Section 232 proceeding.

NOIA and its members stand ready to work with the Department and the Administration to advance our common objective of energy dominance. Please contact Erik Milito (milito@noia.org) or Coby Sammis (csammis@noia.org) with any follow-up questions or to set up a meeting.

Very Respectfully,

A handwritten signature in dark ink, appearing to read "Erik Milito", is placed above the typed name.

Erik Milito
President
National Ocean Industries Association