

September 16, 2025

The Honorable Howard Lutnick
Secretary
U.S. Department of Commerce
1401 Constitution Ave., N.W.
Washington, DC 20230

**Re: Trade Agreement Negotiations to Support U.S. Exports of Innovative
Environmental Technologies**

ETTAC Recommendation 2025-4

Dear Mr. Secretary:

The Environmental Technologies Trade Advisory Committee (ETTAC) is a federally established committee whose purpose is to advise on the policies and procedures of the U.S. government that affect exports of environmental technology, goods and services. This includes small to large businesses, trade associations and thought leaders. In this capacity, the ETTAC appreciates the opportunity to provide these comments and recommendations to help achieve policy goals that lead to more competitive U.S. environmental technology, goods and services providers and create opportunities for their success in international markets that contribute to better balanced trade.

Background

In implementing President Trump's Executive Order 14257, "Regulating Imports With a Reciprocal Tariff To Rectify Trade Practices That Contribute to Large and Persistent Annual United States Goods Trade Deficits" (April 2) the Administration has conducted negotiations with a wide range of trading partners to remove policies that disadvantage U.S. goods and/or services in foreign markets. Such policies include, but are not limited to, customs import tariffs and various types of longstanding, insidious non-tariff barriers. We commend the Administration's efforts to expand global market access for U.S. companies.

Our committee reviewed the terms of the Agreements in Principle for an Economic Prosperity Deal (EPD) with the United Kingdom¹ (released on May 8) and commends the Administration for including the reduction or elimination of several types of non-tariff trade barriers that unfairly discriminate against American exporters of environmental technologies. Our committee also

¹ General Terms for the United States of America and the United Kingdom and Great Britain and Northern Ireland Economic Prosperity Deal, May 8, 2025,
https://ustr.gov/sites/default/files/files/Press/fs/US%20UK%20EPD_050825_FINAL%20rev%20v2.pdf

reviewed the August 21 joint statement with the European Union² and again commends the Administration for including commitments to take similar actions to address such non-tariff barriers.

Recommendations

We recommend that Administration negotiators proceed with implementation, verification, and deepening of these commitments by the UK and the EU to protect U.S. exporters of environmental technologies from harmful non-tariff trade barriers in the UK and EU markets. We further recommend that you direct Administration negotiators seeking agreements with other trading partners to follow the model of the EPD with the UK in setting up a framework agreement that includes targeting timely elimination of non-tariff barriers faced by U.S. exporters of environmental technologies. Furthermore, as negotiations proceed to expand on framework agreements and joint statements, Administration negotiators should consult with U.S. environmental technology sector representatives to maximize opportunities to improve market access and export competitiveness in foreign markets and promote balanced trade.

In line with those specific consultations, to enhance U.S. exports of environmental technologies, we recommend the negotiation of Mutual Recognition Agreements (MRAs) between the U.S. and UK that would support the acceptance of conformity assessment bodies, test results, and related or required certifications. This would align with the shared intent of both governments to expand upon existing MRAs and to facilitate smoother trade in key sectors.

We further recommend that environmental technologies be prioritized in upcoming discussions around the mutual recognition of technical standards and standards development organizations. Building on our March 14, 2025 recommendation, we reiterate the importance of formally recognizing this sector as a strategic component of America's trade policy.

Moreover, we propose that the EPD terms on non-tariff barriers — specifically those related to conformity assessment, MRAs, and standards — serve as a model for future agreements with other trading partners. This approach would create more equitable market access for U.S. innovators.

Unlocking these trade pathways is essential: the UK environmental remediation market alone is projected to reach over \$8.9 billion by 2030. The total size of the UK market for environmental technologies is estimated at \$250 billion by 2030. Ensuring fair and open access for U.S. companies will position American environmental technologies to thrive in this growing market.

However, the EPD's terms on non-tariff barriers do leave a gap that should be addressed with such a close ally and trading partner as the UK: Some U.S. companies have developed and are offering environmental technologies that are so innovative that existing standards do not yet

² Joint Statement on a United States-European Union Framework on an Agreement on Reciprocal, Fair, and Balanced Trade, August 21, 2025, <https://www.whitehouse.gov/briefings-statements/2025/08/joint-statement-on-a-united-states-european-union-framework-on-an-agreement-on-reciprocal-fair-and-balanced-trade/>

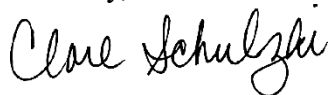
apply. We therefore recommend pursuing, as part of the US-UK EPD, a methodology for both countries to collaboratively develop processes for each government to mutually recognize proof of claim data for emerging environmental technologies. We further recommend streamlining regulatory approvals so that state-of-the-art technologies can be available to solve critical environmental issues important to the people of each country.

Conclusion

We stand ready to provide additional advice and recommendations on this topic because we believe that your leadership can significantly influence the achievement of these important trade outcomes to level the playing field for American businesses offering important environmental technologies.

We appreciate your consideration of these recommendations to advance the leadership and growth of U.S. environmental technology industry exports. We welcome the opportunity to further discuss these issues.

Sincerely,

A handwritten signature in black ink that reads "Clare Schulzki". The signature is written in a cursive, flowing style.

Clare Schulzki
ETTAC Chair

cc: U.S. Trade Representative Greer