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February 23, 2026

Inv. No. TA-201-79 (Safeguard)
Pages: 55

PUBLIC DOCUMENT

VIA ELECTRONIC FILING (EDIS)

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, S.W., Room 112
Washington, DC 20436

Re: Quartz Surface Products Global Safeguard Investigation: Witness Testimony

Dear Secretary Barton:

On behalf of our clients, Arizona Tile LLC ("Arizona Tile"), Elite Quartz Manufacturing ("Elite Quartz"), and M S International, Inc. ("MSI"), American producers and distributors of the subject merchandise, we respectfully submit the enclosed witness testimony and slides in relation to the Injury Phase of the above captioned investigation. This submission is in accordance with the United States International Trade Commission's schedule for the investigation. 1/

This submission includes testimony of:

- Jonathan T. Stoel, Partner, Hogan Lovells US LLP

1/ *Quartz Surface Products; Institution of Investigation, Scheduling of Public Hearings, and Determination That the Investigation Is Extraordinarily Complicated*, 90 Fed. Reg. 55166 (Int'l Trade Comm'n Dec. 1, 2025).

- Michael G. Jacobson, Partner, Hogan Lovells US LLP
- Darrell Turbeville, General Manager, Elite Quartz Manufacturing LLC
- Rich Katzmann, Co-Founder and Chief Commercial Officer, Thryve Innovations
- Janelle Edmonds, Chief Supply Chain Officer, Wisenbaker Builder Services
- Rupesh Shah, Co-Chief Executive Officer, M S International, Inc.
- Yos Shiran, Chief Executive Officer, Caesarstone Ltd.
- Ken Gear, Chief Executive Officer, Leading Builders of America

This submission also includes slides for the testimony of:

- Travis Pope, Principal, Capital Trade Inc.

This submission also includes a video of Elite Quartz Manufacturing, which is available at the following Box link: https://hoganlovells.box.com/s/jmmdiusegfsgp0honq0edeo1w51biow3.

* * *

Service has been effectuated as required by 19 C.F.R. §§ 201.16 and 207.3(b). In accordance with 19 C.F.R. § 207.15 and the Handbook on Filing Procedures, we hereby file this submission electronically on EDIS.

Please contact the undersigned if there are any questions concerning this request.

Respectfully submitted,

HOGAN LOVELLS US LLP

/s/ Jonathan T. Stoel
Jonathan T. Stoel
Jared R. Wessel
Michael G. Jacobson
Maria A. Arboleda
Kelly Heesch Sharbo
Emma K. Peterson, Director of Int'l Trade Analytics

Counsel to Arizona Tile LLC, Elite Quartz Manufacturing, and M S International, Inc.

PUBLIC
CERTIFICATE OF SERVICE

Quartz Surface Products
Investigation No. TA-201-79 (Injury)

I, Natalia Lopez, hereby certify that on February 23, 2026, a copy of the attached submission was served via email on the following parties:

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/s/ Natalia Lopez
Natalia Lopez

HOGAN LOVELLS US LLP

BEFORE THE

UNITED STATES INTERNATIONAL TRADE COMMISSION

<u>QUARTZ SURFACE PRODUCTS</u>
INV. NO. 201-79

TESTIMONY OF JONATHAN T. STOEL
PARTNER, HOGAN LOVELLS US LPP

1. Good afternoon, Chair Karpel, Commissioner Johanson, Commissioner Kearns, and Staff. My name is Jonathan Stoel. I am a Partner at Hogan Lovells representing respondents in this safeguard investigation.

2. The Commission does not hear a safeguard investigation every day. In fact, for many years practitioners and academics alike considered safeguards to be a dead letter. There is a reason for this scarcity—as Ms. Wang explained previously, an affirmative determination in a safeguard investigation requires a petitioner to overcome very high legal hurdles. These burdens are far more exacting and stringent than in the antidumping and countervailing duty investigations with which the Commission is far more familiar.

3. Here, Petitioner QMAA has not overcome its heightened burdens. QMAA has failed to demonstrate that the domestic industry producing quartz surface products is suffering **<u>serious injury</u>** or a threat thereof. Petitioner likewise has failed to show that imports are a **<u>substantial cause</u>** of any such serious injury or threat. Rather, if there was any harm to the domestic industry over the period of investigation, that harm was caused by factors unrelated to imports.

4. Regarding **<u>“serious injury”</u>**:

(A) There has not been significant idling of productive facilities in the domestic industry—the only firm to idle or close its productive facilities during the POI was Caesarstone, which made a strategic decision to close all of its global quartz production operations as Mr. Shiran will explain again today. Moreover, several new quartz slab producers entered the market over the POI—indeed, you just heard from Mr. Turbeville about the resounding success of Elite Quartz. And the domestic fabrication industry has substantially expanded its production capacity and actual production to meet growing demand.

(B) There are not a significant number of domestic producers failing to earn a reasonable level of profit—on the contrary, the domestic industry has been profitable throughout the POI, buoyed by higher average sales prices year after year.

(C) There has not been significant unemployment or underemployment—this is particularly so when the Commission takes into account that Caesarstone exited the industry for reasons unrelated to imports.

5. Regarding **<u>“substantial cause”</u>**: there is a lack of correlation between subject import volumes and the performance of the domestic industry, with U.S. producer profits often moving in the opposite direction of import volumes. Moreover, as our witnesses from MSI and the Leading Builders of America will explain momentarily, quartz imports displaced other surface products such as

granite, not domestically produced quartz slab. And the production capacity of the domestic fabrication industry has expanded—in fact, its performance indicators have all improved over the POI.

6. Lastly, several alternative causes have adversely impacted the domestic industry more than quartz imports over the POI. These causes include:

(A) Recessionary market conditions for the building industry at the end of the POI—these followed the industry's unprecedented success during the COVID-19 period when Americans were stuck at home and invested heavily in their kitchens and bathrooms.

(B) Intra-industry competition, including from new entrants, caused certain domestic slab producers to be less successful towards the end of the POI.

(C) The growth of quartzite, which became the "it" surface product late in the POI, limited quartz sales in the luxury market in which Cambria and a few others compete.

(D) Successful QSP manufacturing requires timely and innovative upgrades to production—certain U.S. slab producers have fallen behind.

(E) Mass tort litigation has limited investment in domestic QSP production in recent years—the ongoing multiplicity of lawsuits has been the leading focus of the domestic industry, including as recently as last week when Cambria's Chief Legal Officer testified on this very topic to Cal/OSHA.

(F) Finally, rising production costs, including increased interest expenses and tariffs on key inputs, harmed the performance of the domestic industry.

7. Thank you for your attention today. I would be pleased to answer any questions.

* * *

I have read the document, to the best of my knowledge, and believe the statements contained therein are true, and I am authorized to sign it.

/s/ Jonathan T. Stoel	February 23, 2026
Jonathan T. Stoel	Date

BEFORE THE

UNITED STATES INTERNATIONAL TRADE COMMISSION

QUARTZ SURFACE PRODUCTS
INV. NO. 201-79 (INJURY)

TESTIMONY OF MIKE JACOBSON
PARTNER, HOGAN LOVELLS

1. My name is Mike Jacobson. I am a Partner at the law firm Hogan Lovells, representing respondents. I'll address the legal issue of the definition of the domestic industry.

2. Both slab producers and fabricators of quartz surface products are part of the domestic industry. The governing statute is crystal clear. 1/ The domestic industry in a safeguard investigation is defined in key part as "the producers as a whole of the like or directly competitive article . . .." 2/ Petitioners admit that quartz slabs and fabricated quartz are all part of the domestic like product. So any U.S. manufacturer of QSP is part of the domestic industry. This is an open and shut issue.

3. This case is reminiscent of the solar safeguard case. There, the Commission determined that independent solar module producers who assembled finished solar panels were part of the domestic industry—just like the upstream solar cell producers. The same is true here.

4. This is not the first time the Commission has assessed this issue. The Commission included fabricators as part of the domestic industry in all four prior

1/ 19 U.S.C. § 2252(c)(6)(A)(i).
2/ 19 U.S.C. § 2252(c)(6)(A)(i) ("the producers as a whole of the like or directly competitive article or those producers whose collective production of the like or directly competitive article constitutes a major proportion of the total domestic production of such article").

occasions. And those were AD/CVD cases, which involve a more restrictive legal standard. Those findings were in the China investigations, the India and Turkey investigations, the China sunset review, and just two months ago in the India and Turkey sunset reviews. The Commission found that all six factors in its standard test for AD/CVD cases support the finding that fabricators are part of the domestic industry. There is nothing to undermine those findings on this record. If anything, fabrication continues to become more complex and involve more added value to the finished product.

5. It is disappointing that Petitioners continue their history of talking down to fabricators, who are the life blood of this industry. In the first investigation of QSP, Petitioners characterized fabricators as operating in "garages with only a couple of employees, a saw, and a hand router." 3/ In their brief in this case they characterized fabricators' added value as "not substantial" and said that fabrication involves low technical expertise using "more generic machinery." This is wrong. Fabrication is a highly skilled and complex craft. In fact, fabricating QSP adds more value to the finished product than making the slab.

6. Fabricators' positions on this case are clear. More than 750 independent fabricators expressed their opposition to these Petitions pre-institution. The Petition was not signed by even one of the approximately 10,000 independent fabricators who employ roughly 100,000 Americans, more than 50-times slab

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3/ Letter from Schagrin Associates to the U.S. International Trade Commission, *Certain Quartz Surface Products from the People's Republic of China: Inv. Nos. 701-TA-606 & 731- TA- 1416: Submission of Post Conference Brief* (May 11, 2018) at Exh. 4, Affidavit of Brian Scoggin.

production jobs in America. This case never should have been instituted. Petitioners are not "representative" of the domestic industry, and thus did not have standing.

7. Now that we are here, you should protect the interests of the true domestic industry manufacturing QSP with a negative vote. Safeguard measures on imported quartz slabs would categorically harm fabricators, the bulk of the domestic industry.

8. Thank you. I'll now turn it over to Darrell Turbeville of Elite Quartz.

* * *

I have read the document, to the best of my knowledge, and believe the statements contained therein are true, and I am authorized to sign it.

/s/ Michael G. Jacobson	February 23, 2026
Michael G. Jacobson	Date

BEFORE THE
UNITED STATES INTERNATIONAL TRADE COMMISSION

QUARTZ SURFACE PRODUCTS
INV. NO. TA-201-79 (INJURY)

TESTIMONY OF DARRELL TURBEVILLE
GENERAL MANAGER
ELITE QUARTZ MANUFACTURING LLC

1. Good afternoon. My name is Darrell Turbeville. I am the General Manager of Elite Quartz Manufacturing LLC, a U.S. producer of quartz slabs operating a manufacturing facility in Latta, South Carolina. Before I begin my testimony, I've brought a video for you to learn a bit about Elite. **PLAY VIDEO**

2. Elite Quartz is a young American manufacturing company, and I'm proud to say, a true American success story. I have been with Elite since the very beginning. We built our operation from the ground up. In mid-2019, we took over a long-vacant building that previously housed a paper mill operated by WestRock and begun to build this business in a rural and economically depressed area.

3. Soon after we started installing machinery, the COVID-19 pandemic hit. International travel shut down abruptly, and the technical teams that were supposed to be on-site to support installation and commissioning could no longer travel. Almost overnight, we found ourselves building a highly technical

manufacturing facility with little on-site support from the equipment suppliers who designed the machinery.

4. At the same time, we were operating in a rural labor market with limited prior experience in quartz manufacturing. We had to recruit, train, and retain a workforce while learning the production processes ourselves—during a global pandemic. Those early years were extremely challenging.

5. Despite these setbacks, we successfully began commercial shipments in 2020. We learned quickly, adapted our processes, and focused relentlessly on improving efficiency and reliability. From the start, we understood that success in this industry would come from great product designs and rigorous execution of our manufacturing plan. That's what we focus on every day.

6. We are proud of how far we have come. Our facility today is fully integrated. We operate multiple forming and polishing lines, and have made significant investments in manufacturing upgrades. Making quartz slabs in the United States is no easy business. We imagine that the other new U.S. quartz slab manufacturers are going through similar issues to be expected of a new entrant into this business. But we are proof that with the right business plan, designs, and people, it can be done successfully. In fact, Elite has been profitable every year since 2022, and increasingly so.

7. A big part of our success is our patent-protected products. Our products are selected based on design attributes—such as depth, movement, consistency, and the ability to replicate natural marble and quartzite looks. We target the high-end market, at premium prices. We focus on producing a small number of SKUs that are on-trend. If you can't stay on trend, it does not matter your price point—people won't buy a countertop that doesn't look good.

8. You might be wondering why Elite is here today opposing trade relief. First of all, fabricators are the core customer base for Elite' products. They overwhelmingly oppose these petitions, and we want to support their businesses. If they are successful, we are successful.

9. Second, we do not view imports as competition. We compete exclusively in the high-end, luxury segment of the market. Customers typically begin the selection process by identifying a price tier or budget, and then choose based on aesthetics and design. They rarely cross-shop across different price bands. As a result, Elite does not compete head-to-head with lower-priced imported products that serve the mass market. Instead, we compete primarily against other U.S. producers that target the premium segment, like Cambria, Dal-Tile, and LX.

10. Third, we do not need the government's trade protection. We don't understand why the Petitioners you heard from this morning think that tariffs and

quotas will solve their problems. To the extent they are having problems, they have nothing to do with imports. In fact, we are actively developing several new, innovative designs that will support Elite's continued growth and profitability.

11. Our distributor partners sell Elite products at two or three times the price of many imported products. The end customers still increasingly are choosing Elite's higher priced products, and we are making a good profit on our sales. The presence of imports in the same distribution channel does not harm us at all.

12. I've looked at the data in your staff report. I was very surprised about the high per unit costs reported by the overall domestic industry. Our costs are much lower.

13. The trade measures requested by Petitioners would only serve to raise costs across the supply chain—for fabricators, builders, and ultimately American consumers. This case cannot make Petitioners more innovative. It cannot improve their manufacturing efficiency. It cannot make their designs better.

14. In closing, American manufacturers can thrive without trade barriers when they do the hard work—build from the ground up, learn through adversity, invest domestically, and become more efficient over time. For those reasons, Elite Quartz respectfully opposes safeguard measures in this investigation.

15. Thank you.

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I have read the document, to the best of my knowledge, and believe the statements contained therein are true, and I am authorized to sign it.

/s/ Darrell Turbeville	February 23, 2026
Darrell Turbeville	Date

BEFORE THE

UNITED STATES INTERNATIONAL TRADE COMMISSION

QUARTZ SURFACE PRODUCTS
INV. NO. 201-79 (INJURY)

TESTIMONY OF RICH KATZMANN
CO-FOUNDER AND CCO OF THRYVE INNOVATIONS AND
FORMER EXECUTIVE DIRECTOR OF THE ROCKHEADS GROUP USA

1. My name is Rich Katzmann. I have spent the latter part of my career working with quartz and natural stone fabricators across the United States. I recently founded a new business called Thryve Innovations which helps fabricators use AI to improve their operations. Until recently, I served as the Executive Director of The Rockheads Group USA, a national association of around 120 of the largest fabricators across fifty states. In that role, I ran industry benchmarking reports, supported best practices, and worked directly with owners who collectively employ around 10,000 American manufacturing workers. The Rockheads Group filed a letter with you in November on opposing this Petition.

2. The heart of the domestic quartz industry is fabrication. There are nearly ten thousand fabricators employing hundred thousand of Americans across the country. I spend a lot of time talking to fabricators. I have yet to hear more than 1 or 2 fabricators say that they support this case. To the contrary, they are terrified of what this case could do to destroy their businesses.

3. Let's talk a bit about what fabricators do. I saw that the Petitioners said that "the value added during the fabrication process is not substantial" and that

fabricators "do not engage in sufficient production-related activities." This is not true.

4. Fabrication is capital-intensive, sophisticated manufacturing. Modern fabricators invest millions of dollars in CNC saws, waterjets, polishing lines, robotics, dust-collection systems, and digital templating technology. Their workers are skilled manufacturing employees who cut, edge, polish, finish, and install quartz products to exact specifications. Fabrication requires continuous investment in equipment, training, and safety systems.

5. Fabricators add substantial value to quartz slabs through complex, high-precision manufacturing processes. Unfabricated slabs have zero value to an end user. Virtually all fabricators are also installing the product, which adds even more value.

6. Fabricators like working with quartz. They often can earn higher margins on quartz than on other surface products. This is because quartz is more consistent, easier to fabricate repeatably, and can result in less waste. If quartz becomes less available or more expensive due to this case, they will have no choice but to fabricate more granite and other materials that are harder to work with, less efficient, and less profitable in order to meet the needs the customers.

7. You may be wondering why more fabricators did not submit questionnaires in this case. It's not indifference. Believe me, they care deeply about what is happening today. However, many of the fabricators that I've spoken with are afraid of speaking out publicly. They fear the strong political connections of the

slab manufacturers. They also fear retaliation or other commercial consequences for speaking out against the Petitioners. Many do not want to lose business with the Petitioners. Many were willing to sign confidential declarations opposing the case, but they simply could not risk their name showing up in the public record.

8. This case comes at the worst possible time. Many fabricators, especially those serving builders and multi-family housing, are at the center of the country's affordability crisis. They face tight margins, volatile demand, and rising costs. Slab shortages and price spikes caused by this case would disrupt production schedules, force material substitutions, and reduce throughput. In many cases, fabricators would have no choice but to scale back operations or lay off workers.

9. In closing, safeguard relief on quartz slabs would not protect the domestic industry. It would harm the largest and most labor-intensive segment of it. Fabricators overwhelmingly oppose this case because they understand what is at stake: their workers, their investments, and their ability to operate. For those reasons, I respectfully urge the Commission to vote negative. Doing so would protect the domestic industry led by the fabricator community.

10. Thank you.

* * *

I have read the document, to the best of my knowledge, and believe the statements contained therein are true, and I am authorized to sign it.

/s/ Rich Katzmann	February 23, 2026
Rich Katzmann	Date

Before the U.S. International Trade Commission
Quartz Surface Products
Inv. No. TA-201-79 (Injury)

Remarks of Janelle Edmonds, Wisenbaker Builder Services

My name is Janelle Edmonds. I am the Chief Supply Chain Officer at Wisenbaker Builder Services. We are one of the largest fabricators of QSP in the United States. As the name indicates, we are a builder service provider, and one of those services is supplying and installing countertops in new home construction.

QSP is one of several surface products that can be utilized as household countertops, and our product selections reflect a combination of builder and homebuyer preferences on design and physical characteristics, as well as the need to keep materials at prices that will be affordable for the homeowner.

In 2024, my company fabricated slightly under 2 million square feet of finished QSP and approximately three-quarters of a million square feet of surface products other than QSP, including nearly 350,000 square feet of natural stone.

We employ approximately 1,100 U.S. workers who support our turnkey builder services. We supply reliable products at price ranges that fit each construction project, as this is essential to keeping our workers employed and to building affordable homes.

We are unique in our market because we purchase a substantial amount of countertop material but also fabricate every foot we purchase for installation in a new home. One of the other services we provide is the operation of Design Centers where our employees present and sell our countertops to our builders' customers. So, our view on how QSP would be impacted by this case is extensive as it is from several perspectives, including sourcing, selling, and fabricating, then completing the cycle at the final installed product.

The market has shifted to QSP because quartz offers the designs customers prefer at prices builders can afford to incorporate into their selections. Our homebuyer customers select QSP for design, aesthetic qualities, and ease of maintenance. The trend of clean, subtle patterns, marble-like veining, and a color palette inclusive of soft whites and creams, can be created with quartz. A discovered natural stone cannot consistently provide the same aesthetic, and they require additional care and maintenance. All QSP sourced from Cambria or any other suppliers require little or no maintenance.

Our builder customers include QSP in their offering not only for the visual qualities and homebuyer demand but also because it can be obtained within a feasible cost range for residential projects.

If imported QSP becomes more expensive, difficult to source, or has limited design options, then the materials we fabricate for our builder customers could shift toward alternative materials, <u>not necessarily to domestically made QSP</u>. Rather, we will be forced to shift back to buying larger volumes of natural stones, solid surface products, engineered marble, or similar alternative surfaces, which are less popular today with our customers than QSP.

We have had many vendors in our program over the years, including Cambria and Daltile. We have been fabricating Cambria since 2015 but added them formally to our program in 2022 after many years of back and forth to align both companies. Cambria has given two substantial price increases in 2025, totaling 6%, saying that they were due to inflation and for no other reason. We have not, however, seen that from all vendors.

The Cambria aesthetic has not changed tremendously over the years, so stylistically this is limiting. They seldomly drop colors from their line, so the program is vast, but not necessarily in adherence with the current trends only.

They do not create repeat patterns in the veined products; each slab is unique, and this is part of their sales strategy, but this makes the sales process closer to a natural stone rather than a manufactured quartz material. For builders and buyers that want consistency, or for us to have the ability to set clear expectations, this can make selections more limited, or more suited to a particular buyer niche. For this reason, Cambria is our only vendor we ask to provide their own samples due to the inconsistency from piece to piece. During fabrication this can make for lower yields, especially on the more extreme colors. For our large and fast-moving fabrication setting, long production runs or a specific color is hugely important for the utilization of partials or the need to match previous installs. Cambria's production runs are shorter, and this causes issues with matching material over time due to color inconsistencies. We have more material delays with Cambria than most vendors as well, though now that they have adopted our forecasting, this has become less of a problem.

Due to the current climate, sourcing products with limited amounts of crystalline silica has become more important for some customers. Cambria does not offer low or no silica products like most of their competitors, which is another limit to their attractiveness to some market segments. That said, Cambria's stake in our offering has the potential to expand if they:

- diversified the range of designs,
- offered some consistent designs from slab to slab,
- simplified the offering by removing their slowest moving colors,
- had a wider range of pricing for the "basic" to "luxury" lines,
- added low or no silica products, and
- continued to adhere to our forecast.

One final word on Cambria. The majority of the QSP supplied by Cambria is suited for the retail customer at a high price point, not the typical American new home buyer. We do not understand why they brought this case. Lower availability and higher prices for imported quartz will not materially impact our purchases from Cambria. It will just hurt us, other fabricators like us, and our customers.

/s/ Janelle Edmonds   February 23, 2026

Janelle Edmonds   Date

BEFORE THE

UNITED STATES INTERNATIONAL TRADE COMMISSION

QUARTZ SURFACE PRODUCTS
INV. NO. 201-79

TESTIMONY OF RUPESH SHAH
CO-CHIEF EXECUTIVE OFFICER, M S INTERNATIONAL, INC.

1. Good afternoon. My name is Rupesh Shah. I am the co-Chief Executive Officer of M S International, Inc., or MSI. MSI is a leading distributor of surface products in the United States. We distribute many surface products, including engineered quartz, granite, marble, quartzite, luxury vinyl tile and porcelain, to our builders, fabricators, and dealers across the country.

2. I have spent most of my professional life in the stone and surface products industry. As portrayed in one of the QMAA's exhibits, MSI was founded in the 1970s by my parents in the basement of our family home in Ft. Wayne, Indiana.

3. MSI entered the quartz industry in late 2008. I have seen quartz evolve from a niche product to the most widely used countertop surface in the United States. This is not unique. I have also seen multiple design cycles, shifts in consumer preference, and changes over the last 20+ years in the surfaces industry. For example, we saw granite take market share from all other countertop surfaces in the early 2000s. More recently, we have seen luxury vinyl tile take market share from other flooring surfaces, including carpet.

4. Quartz is not a commodity product competing primarily on price. There are literally thousands of unique quartz designs available in the market today. A customer's primary reason to buy a particular quartz product is design. If the look is wrong, the customer will walk away and the sale will be lost. This is so irrespective of the supplier or from where the product was sourced.

5. Design trends change quickly. Keeping up requires frequent product refreshes and a willingness to invest substantial time, effort, and capital in product development and new patterns. Both MSI and our suppliers, in consultation with our customers, must make choices about how often we introduce new designs and predictions about which designs will be the most successful. Those business decisions are critical to our success. If we can't continue to adapt with innovative designs that consumers want and desire, MSI will fail.

6. From my perspective, the most important point for the Commission to understand is this: quartz products do not compete only with other quartz products. Quartz competes every day with slabs of granite, quartzite, marble, and porcelain in the countertop market. That fundamental market condition is central to understanding what is happening in this market. Customers have increasingly turned away from granite over the past decade, with quartz becoming increasingly popular in the mass market.

7. Relatedly, if prices for a surface product such as quartz increase too much, our customers will turn to other surfaces. You already heard about this dynamic from Wisenbaker with respect to the builder segment. And Cambria is also

very familiar with this market dynamic—this is because a new addition to the surface market, quartzite, a natural stone product, has taken substantial share from high-end quartz countertop products over the last few years. Quartzites are very high priced and cater to the ultra-premium segment of the market. Simply put, a large percent of ultra luxury consumers have shifted their preference away from quartz to quartzites as the most desirable countertop surface.

8. Petitioners contend that domestic producers had ample capacity that was displaced by imports. But production capacity is not the same as commercially usable supply. Builders and fabricators need the right designs, in the right thickness and finishes. Consistent availability and prompt delivery are critical. When those elements are missing, capacity does not translate into sales. You just heard in this regard from Mr. Turbeville about the many challenges of quartz manufacturing here in the USA.

9. I also want to address MSI's role with respect to domestic production. MSI does not own Elite Quartz. In the last five years, MSI has done more to support and successfully grow domestically produced quartz than any other company in this industry. We decided to market and distribute significant volumes from Elite Quartz, helping to scale its production, achieve efficiency, develop innovative looks, and earn margins above industry norms. Our distribution platform allows domestic producers like Elite to reach customers efficiently and at scale, and lets them focus on what they do best—manufacturing.

10. We would welcome the opportunity to partner with additional domestic slab producers under similar arrangements. We would like nothing more than to see more U.S. producers succeed by selling into our distribution network.

11. Finally, we also support fabricators across the country by bringing predictable supply and competitive offerings to market. Fabricators have been critical to the quartz industry's growth. Without financially healthy fabricators, there simply is no quartz countertop industry.

12. In sum, the U.S. quartz market is healthy and competitive. Quartz imports are part of a broader surface-materials ecosystem that supports tens of thousands of American jobs. For these reasons, I respectfully urge the Commission to reject the safeguard petition.

13. I would be pleased to answer any questions.

* * *

I have read the document, to the best of my knowledge, and believe the statements contained therein are true, and I am authorized to sign it.

/s/ Rupesh Shah	2/23/2026
Rupesh Shah	Date

BEFORE THE
UNITED STATES INTERNATIONAL TRADE COMMISSION

QUARTZ SURFACE PRODUCTS
INV. NO. TA-201-79 (INJURY)

TESTIMONY OF YOS SHIRAN
CHIEF EXECUTIVE OFFICER
CAESARSTONE LTD.

1. Good afternoon, Madame Chair, Commissioners, and Staff. Thank you for the opportunity to testify today.

2. My name is Yos Shiran. I am the Chief Executive Officer of Caesarstone Ltd. We have been a leader in the engineered quartz surface products (QSPs) for more than 35 years. We operated across the full value chain, including manufacturing facilities in both the United States and abroad.

3. Beginning in 2023, Caesarstone undertook a comprehensive global strategic transformation. We made the decision to exit slab manufacturing worldwide and to focus our resources on what has consistently differentiated our company – innovation, design leadership, product development, brand building, and distribution.

4. I led that decision-making process. I want to state clearly: Caesarstone did not close its U.S. manufacturing operations because of import competition.

5. Quartz slab manufacturing is highly capital-intensive and operationally complex. Efficient production requires substantial and ongoing capital investment, sophisticated procurement capabilities, deep engineering expertise, and consistent operational focus.

6. In addition, quartz manufacturing depends on reliable and competitively priced access to key raw materials — particularly binders, resins, additives, pigments, and specialty inputs. We found it difficult to source several of these components efficiently. This structural market reality was an important factor in our global decision to halt quartz manufacturing.

7. Our evaluation was global in scope. We closed our Sdot-Yam facility in Israel in 2023, followed by our Richmond Hill, Georgia facility later that year, and ultimately our Bar-Lev facility in 2025. This was not

a U.S.-specific response—it was a global restructuring designed to reposition Caesarstone for long-term competitiveness.

8. Instead of allocating capital to plant utilization, we redirected investment toward research and development, new materials, design platforms, and brand development. That shift has enhanced our agility and strengthened our ability to respond to evolving market trends.

9. Importantly, exiting direct manufacturing does not mean relinquishing oversight. Caesarstone works with carefully qualified production partners that meet our stringent technological and quality standards. We maintain rigorous technical specifications and quality controls to ensure consistency and performance across our product portfolio.

10. The U.S. quartz market is design-driven and highly diverse. Customers prioritize aesthetics, innovation, reliability, and brand reputation. Success in this market requires continuous design evolution,

product differentiation, and dependable supply. That is where Caesarstone has chosen to concentrate its expertise and capital.

11. Caesarstone remains deeply committed to the United States. We employ 330 U.S. employees and maintain strong partnerships with American fabricators, designers, architects, builders, retailers, and homeowners.

12. Even when Caesarstone operated a U.S. manufacturing facility, domestic products alone could not satisfy the breadth of design variety and volume demanded by our U.S. customers. A reliable and diverse global supply base is essential to meeting our customer expectations.

13. The safeguard restrictions sought in this investigation would reduce design availability, increase input costs for fabricators, and impose burdens on builders and consumers. As you have heard, fabricators perform the majority of value-added work in this industry and account for

far more production workers than slab producers. Constraining slab supply would directly and adversely affect their businesses.

14. In sum, Caesarstone's strategic transformation reflects structural market realities, not import-driven injury. Our experience demonstrates that companies can adapt and compete successfully through innovation and strategic focus.

15. I would be pleased to answer any questions. Thank you.

* * *

I have read the document, to the best of my knowledge, and believe the statements contained therein are true, and I am authorized to sign it.

/s/ Yos Shiran	February 23, 2026
Yos Shiran	Date

BEFORE THE

UNITED STATES INTERNATIONAL TRADE COMMISSION

QUARTZ SURFACE PRODUCTS
INV. NO. 201-79 (INJURY)

TESTIMONY OF KEN GEAR
CHIEF EXECUTIVE OFFICER OF LEADING BUILDERS OF AMERICA

1. My name is Ken Gear. I am the Chief Executive Officer of Leading Builders of America. LBA represents 22 of the largest production homebuilders in the United States. Collectively, our members build more than half of all new single family homes in this country, primarily entry-level and workforce housing for everyday American families. LBA members build in every major US housing market, employ hundreds of thousands of employees directly and indirectly generate over 2 million more jobs through our construction trade partners.

2. Homebuilders are among the largest purchasers of quartz surface products in the United States. Your decision in this case will have a major impact on the ability of millions of everyday Americans to afford a home.

3. Everything we do today is driven by one overriding issue: affordability. The affordability crisis in the housing sector has been widely reported and should come as no surprise. According to the Federal Reserve, home prices have increased 17% since the pandemic. According to the National Association of Realtors, the median existing-home price rose from about $222,700 in 2012 to over $400,000 in 2024 — roughly an 80% increase. Meanwhile, U.S. median household income (per the U.S. Census Bureau) increased by less than half that amount over the same

period. According to the National Association of Realtors, the average first-time home buyer is now 40 years old – the oldest on record due to the lack of affordability. And the National Association of Realtors Housing Affordability Index shows affordability at its lowest level since the 1980s. This is driven by excessive regulation, high mortgage rates, supply challenges and rapid price appreciation. It's also driven by trade measures, like the tariffs and quotas threatened in this case. The affordability crisis has pushed home ownership out of reach for many Americans.

4. Despite wide political divisions today, policy makers at all levels of government, from all parts of the political spectrum are united on the need to make housing more affordable. I have spent the past year on Capitol Hill and at the White House talking with policymakers about this problem. Whether it is the House, the Senate, or the Administration, state legislatures or Mayor's offices, the message is the same: housing must become more affordable. President Trump agrees. He said earlier this year, I quote: "My Administration remains committed to cutting red tape, boosting supply, and delivering lasting affordability so every American can achieve the dream of homeownership."

5. Builders are keenly focused on addressing this crisis by building quality and affordable homes. Builders look for opportunities to lower home prices on every input. Our members are trying to fix this problem, but cases like this are categorically harmful to that mission.

6. If you learn one thing from me today, I hope it is that this case will do nothing to help domestic producers of quartz countertops sell more to builders.

Let me tell you a quick story. I attended the International Builders Show last week in Orlando. At that event, I met with the lead buyers and procurement staff of my member companies to discuss many matters including this case. When I was asked, "Why would the ITC consider tariffs in this market?" I said that the domestic quartz producers are arguing that builders will switch to buying higher-priced U.S.-made quartz if 50% tariffs and quotas were imposed. Before I finished my sentence, the room broke out in laughter at the suggestion that American homebuilders would increase costs on any input today by 5%, never mind 50% higher costs. That's simply not possible, and flies in the face of what the policy maker and our customers are asking us to do.

7. If you authorize these new trade measures, it will just switch the type of imported countertop used by builders. Based on information from our members, around half of homes built by major production builders such as Lennar, PulteGroup, and D.R. Horton used granite countertops a decade ago, with solid surface and laminate also making up a portion. Today, granite is used only in about 10 percent of new home builds, with quartz representing most of the remaining 90 percent. This shift from granite to quartz occurred for two main reasons. First, quartz became more available at a competitive price point with granite. Second, the look of certain quartz designs became more popular. If quartz becomes more expensive or less available, builders will not trade up to higher-priced alternatives. They will go back to granite, or to solid surface or laminate. New tariffs or quotas will not redirect demand for quartz. It will destroy it.

8. I understand that this is the third time that Cambria has petitioned you for tariffs. In most markets, our large homebuilder members are never buying luxury quartz products like Cambria for entry level or workforce housing. Those products are designed for custom, high-end homes, not for large-scale production housing. We build for middle-class families who simply cannot afford those high prices. If it's not lower-priced quartz, they will find another lower-priced alternative. They just won't like it as much as quartz.

9. On behalf of LBA, homebuyers across the country, and the millions of families we serve, I respectfully urge the Commission to vote negative.

10. Thank you for your time and attention.

* * *

I have read the document, to the best of my knowledge, and believe the statements contained therein are true, and I am authorized to sign it.

/s/ Ken Gear	February 23, 2026
Ken Gear	Date

Hogan Lovells

Quartz Surface Products—Safeguard Legal Standards

Jonathan T. Stoel and Michael G. Jacobson

Quartz Surface Products

USITC Inv. No. TA-201-79 (Injury)

February 24, 2026

"Domestic Industry" Legal Standard

- Section 2252(c)(6)(A)(i) of the Trade Act defines the **domestic industry** as "the producers *as a whole of the like or directly competitive article or those producers whose collective production of the like or directly competitive article* constitutes a major proportion of the total domestic production of such article"

- Safeguard definition is broader than the AD/CVD standard and focuses on domestic productive resources, not artificial upstream/downstream distinctions

- The Commission has found that fabricators are part of the domestic industry in all four prior cases

“Serious Injury”—Legal Standard

- The Commission must determine whether imports have increased in such quantities as to be a **substantial cause** of **serious injury** to a domestic industry, or threat thereof

- **Serious injury** means “a significant overall impairment in the position of a domestic industry”—19 U.S.C. § 2252(c)(6)(C)
  - –Significant idling of productive facilities;
  - –Inability of a significant number of firms to carry out domestic production operations at a reasonable level of profit; and
  - –Significant unemployment or underemployment within the domestic industry.

"Substantial Cause"—Legal Standard

- **Substantial cause** means "a cause which is important and not less than any other cause"—19 U.S.C. § 2252(b)(1)(B)
  - Imports must be an important cause of the serious injury **and**
  - Imports must be at least as important as every other cause of that injury

- The QMAA has failed to meet its legal burden with respect to **all "serious injury" and "substantial cause" criteria**

Quartz Surface Products
Inv. No. TA-201-79
(Injury Phase)

February 24, 2026

Presentation Accompanying Written Testimony at the United States International Trade Commission

CAPITAL ★ TRADE
INCORPORATED

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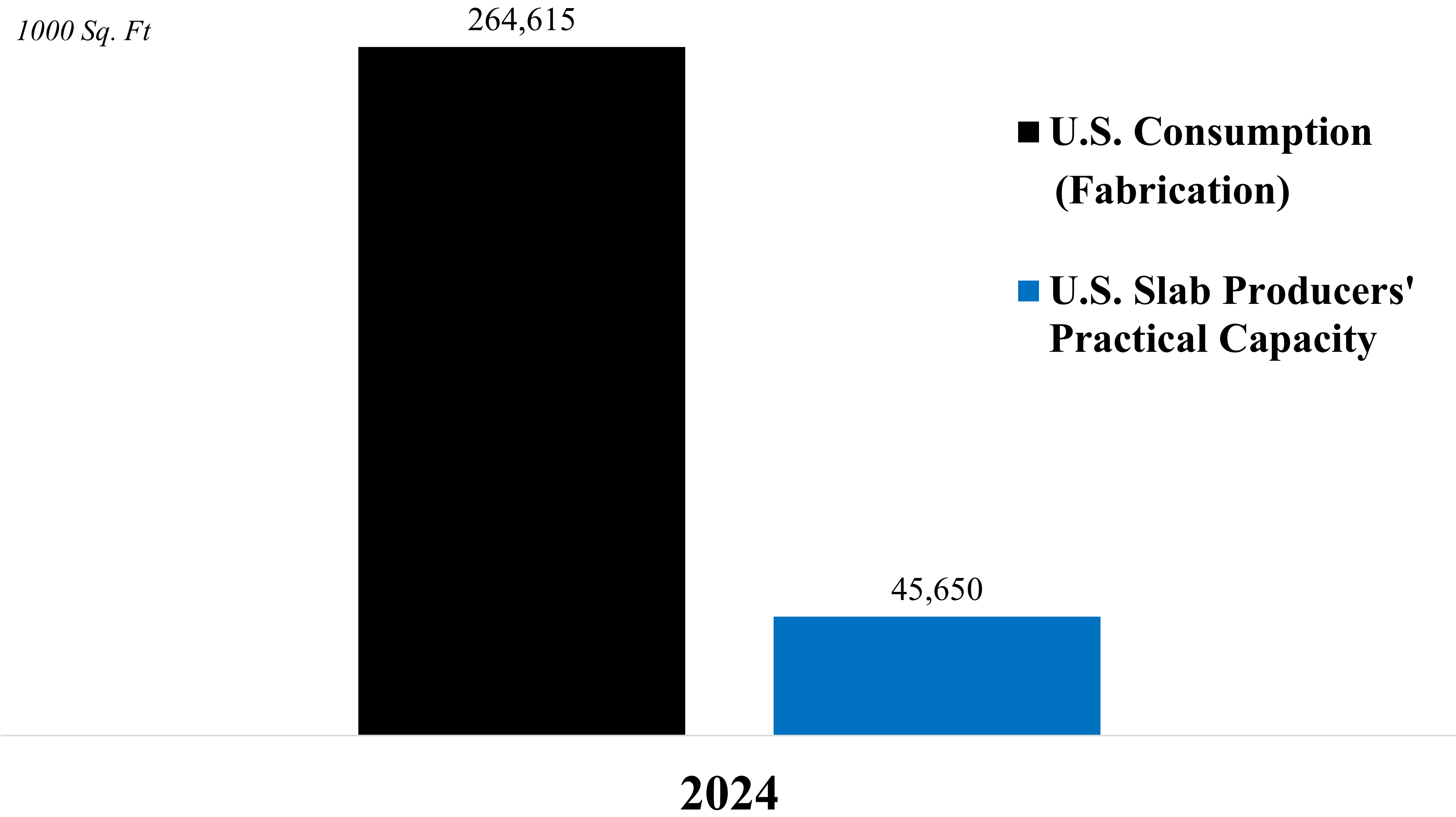
Overview

Relevant Economic Factors

The Domestic Industry Is Healthy

Imports Are Not a Substantial Cause of Serious Injury

Slab Supply Gap



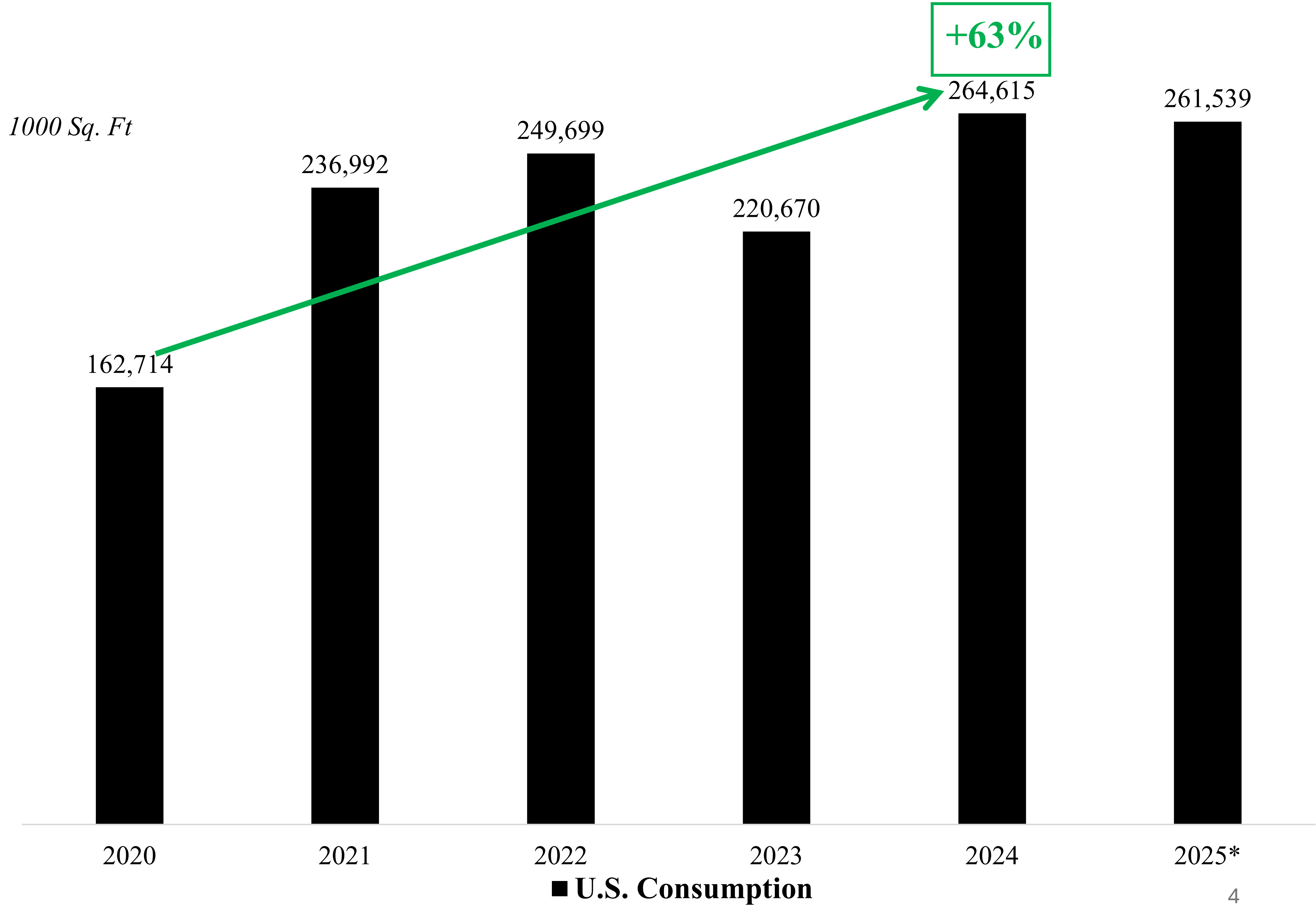
Source: Public Pre-Hearing Report at Table C-1.

Demand Conditions

- U.S. consumption of QSP increased significantly since 2020.
- This increase is not only the result of downstream demand trends, as the U.S. construction and remodeling sectors have slowed since 2023.
- Rather, QSP has grown in part by substituting other surface materials, especially granite.
  - Share of imports of surface products:
    - Quartz: **+16%** (percentage points)
    - Granite: **−14%**
    - Marble: **−2%**
- Competition with alternative surface materials means that demand is elastic.

Source: Public Pre-Hearing Brief of Arizona Tile LLC, Elite Quartz Mfg., and M S International, Inc at 30-38; Public Prehearing Report at 6.23.

Demand for QSP Has Increased



Source: Public Pre-Hearing Report at Table C-2; interim data annualized to full year.

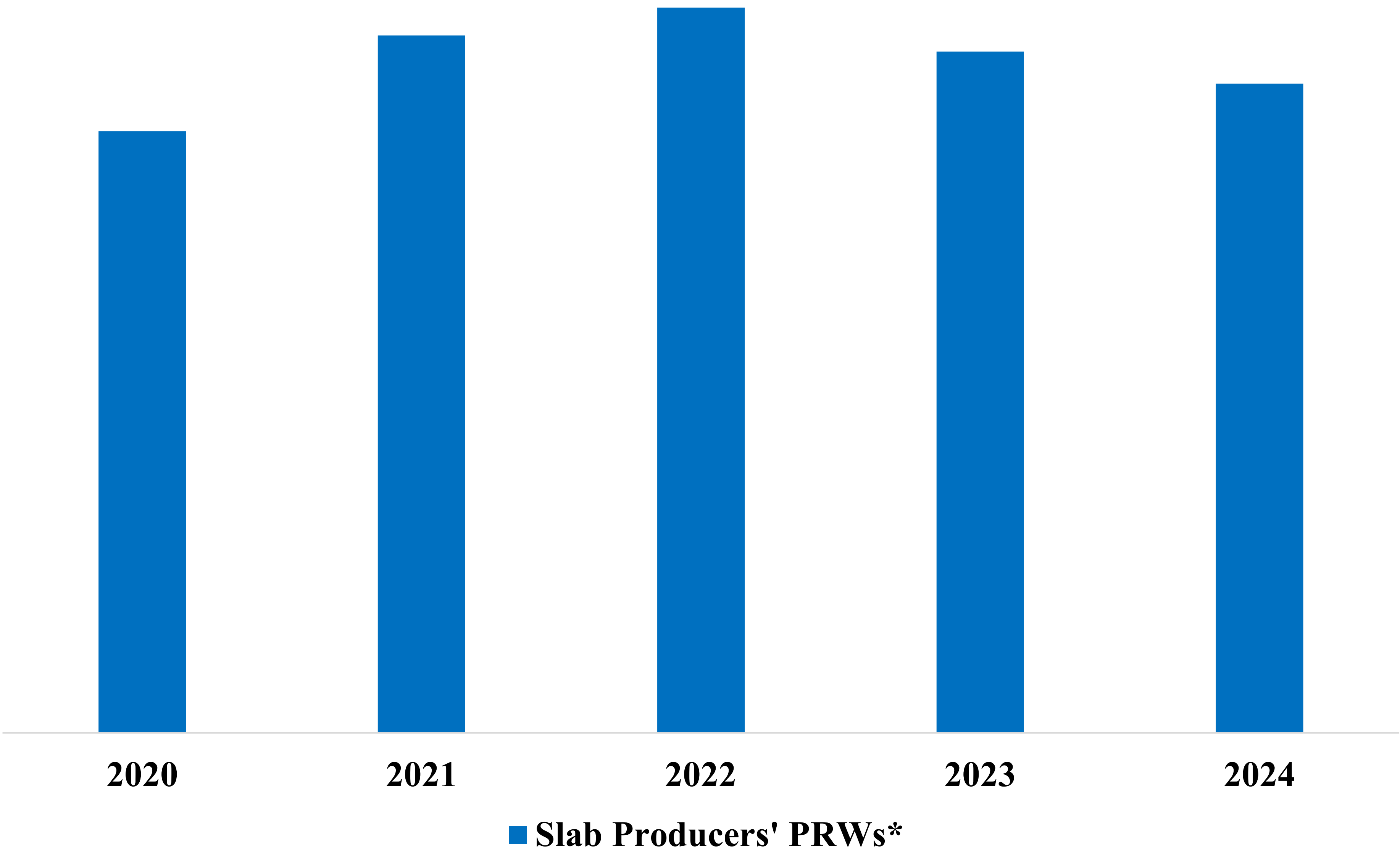
Domestic Industry Is Healthy

- No idling of facilities caused by imports
- The domestic industry earned a reasonable level of profit
- From 2020 to 2024, U.S. slab producers…
  - Net sales values ⬆
  - Net sales unit values ⬆
  - Gross profit and margin ⬆
- Fabricators remained strong and profitable.

Source: Public Pre-Hearing Report at Table C-1, Public Pre-Hearing Brief at 52-55.

Domestic Industry’s Employment Increased

No Unemployment or Underemployment



Source: Slab producers’ data excluding Caesarstone; indicative only.

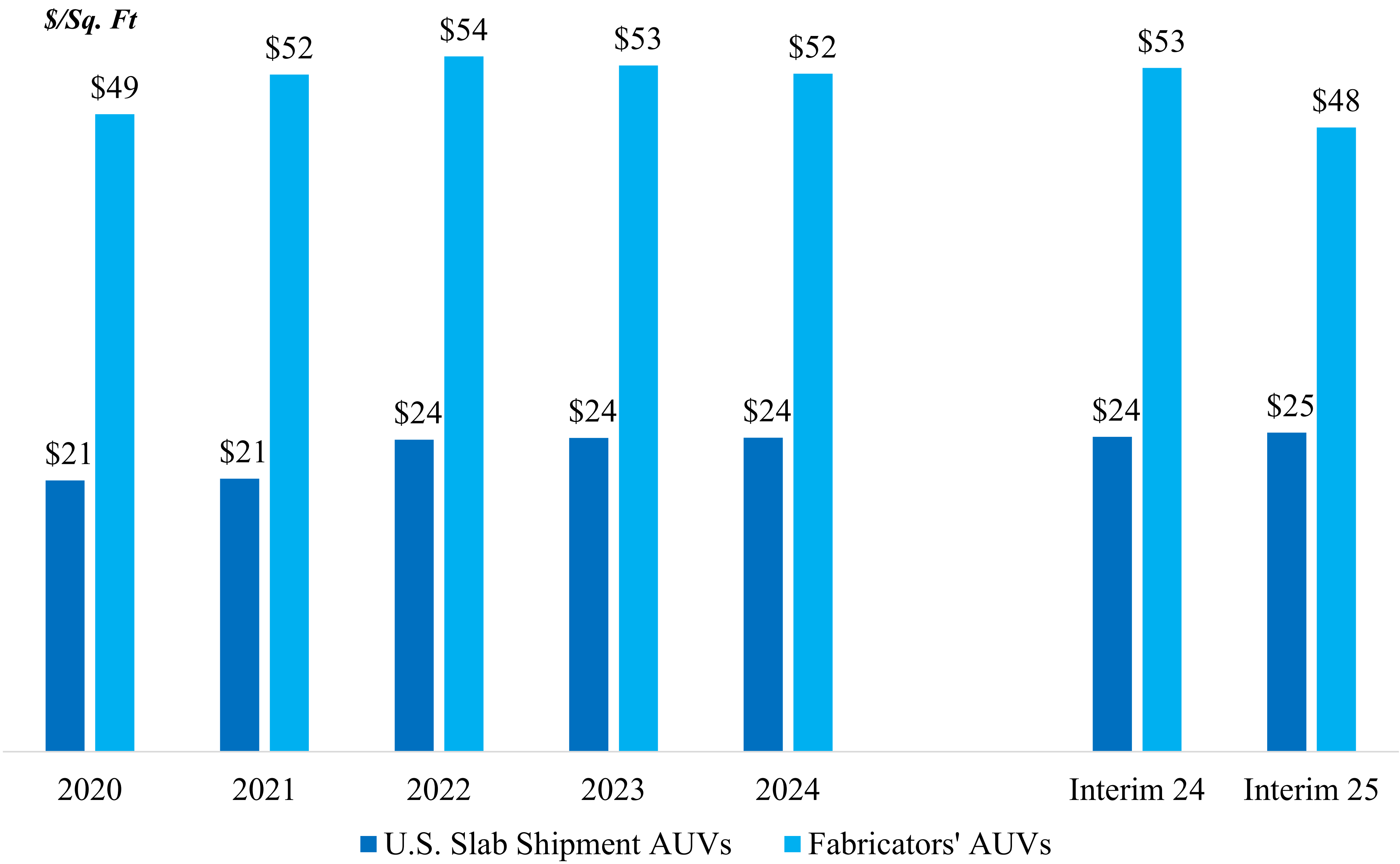
Caesarstone Underwent Company-Wide Strategy Shift

The domestic industry data excluding Caesarstone shows an even healthier domestic industry from 2020 to 2024:

- Increasing capacity
- Stable production
- Increasing net sales
- Increase in production workers, wages, and hours worked

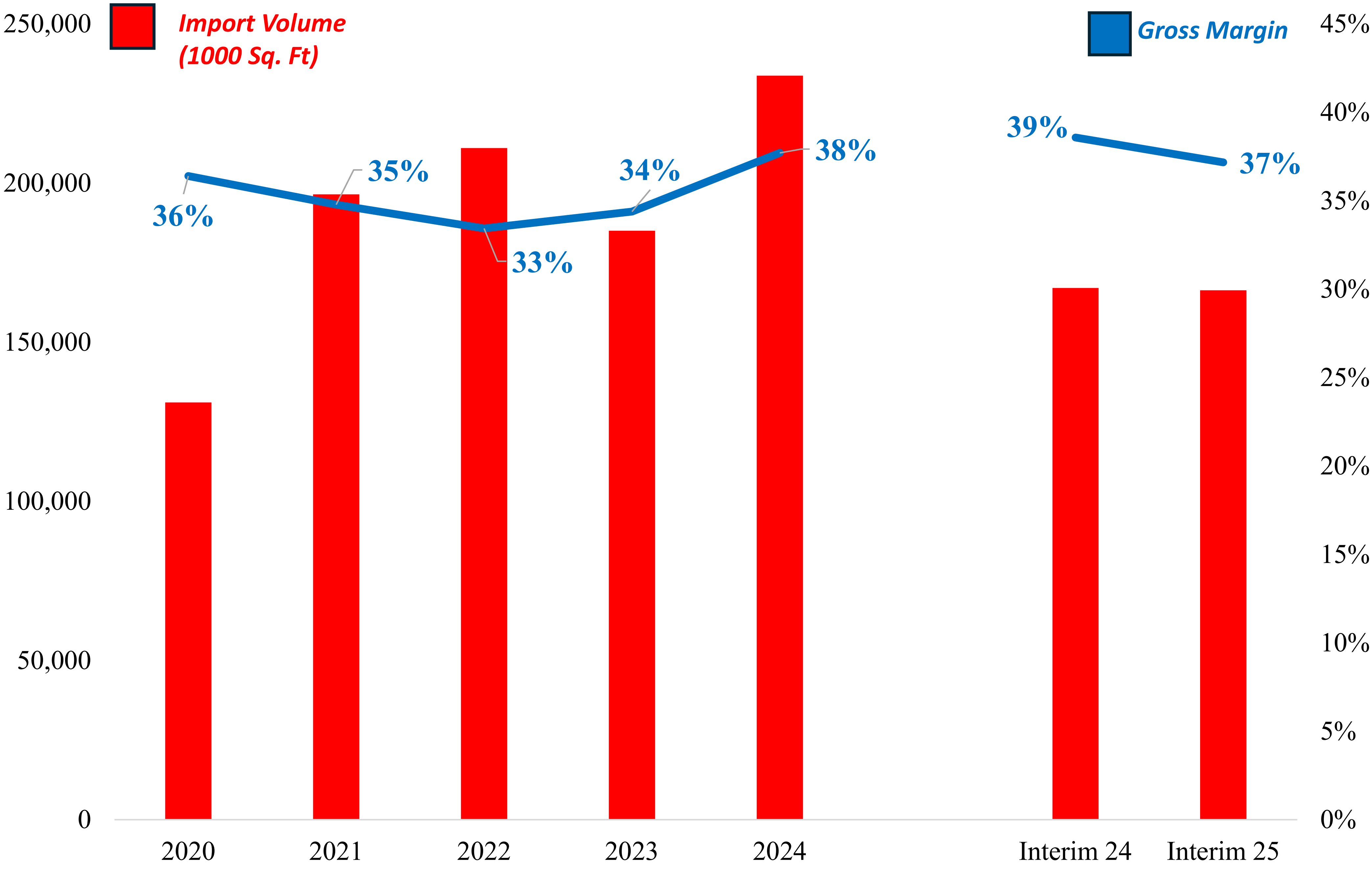
Source: Public Pre-Hearing Brief of Arizona Tile LLC, Elite Quartz Mfg., and M S International, Inc at 52-56, 70; Exhibit 1-D.

Domestic Industry Increased Prices Over The POI



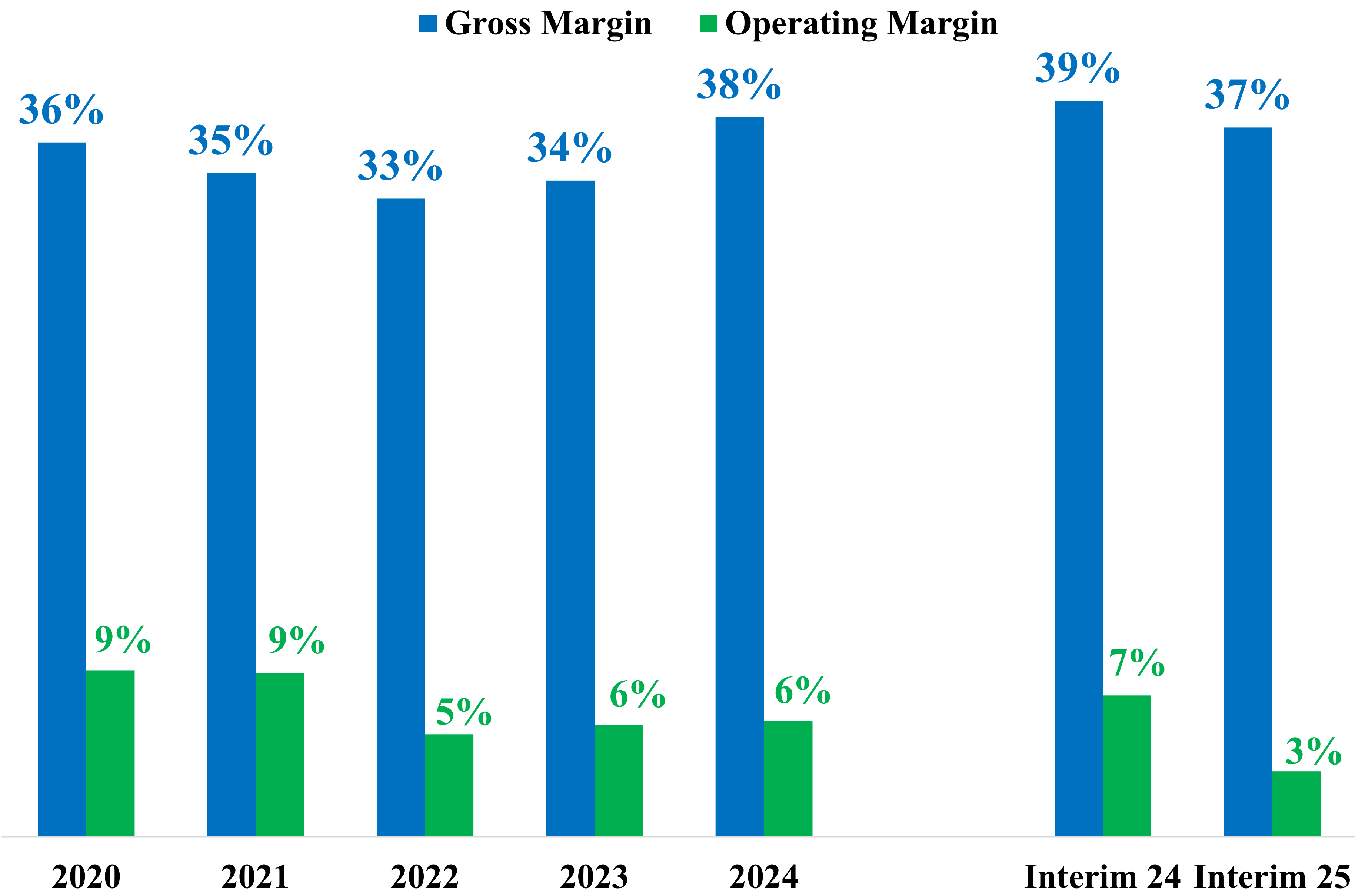
Source: Public Pre-Hearing Report at Table C-1; Table I-17.

Import Volume Does Not Correlate With U.S. Slab Producers' Performance



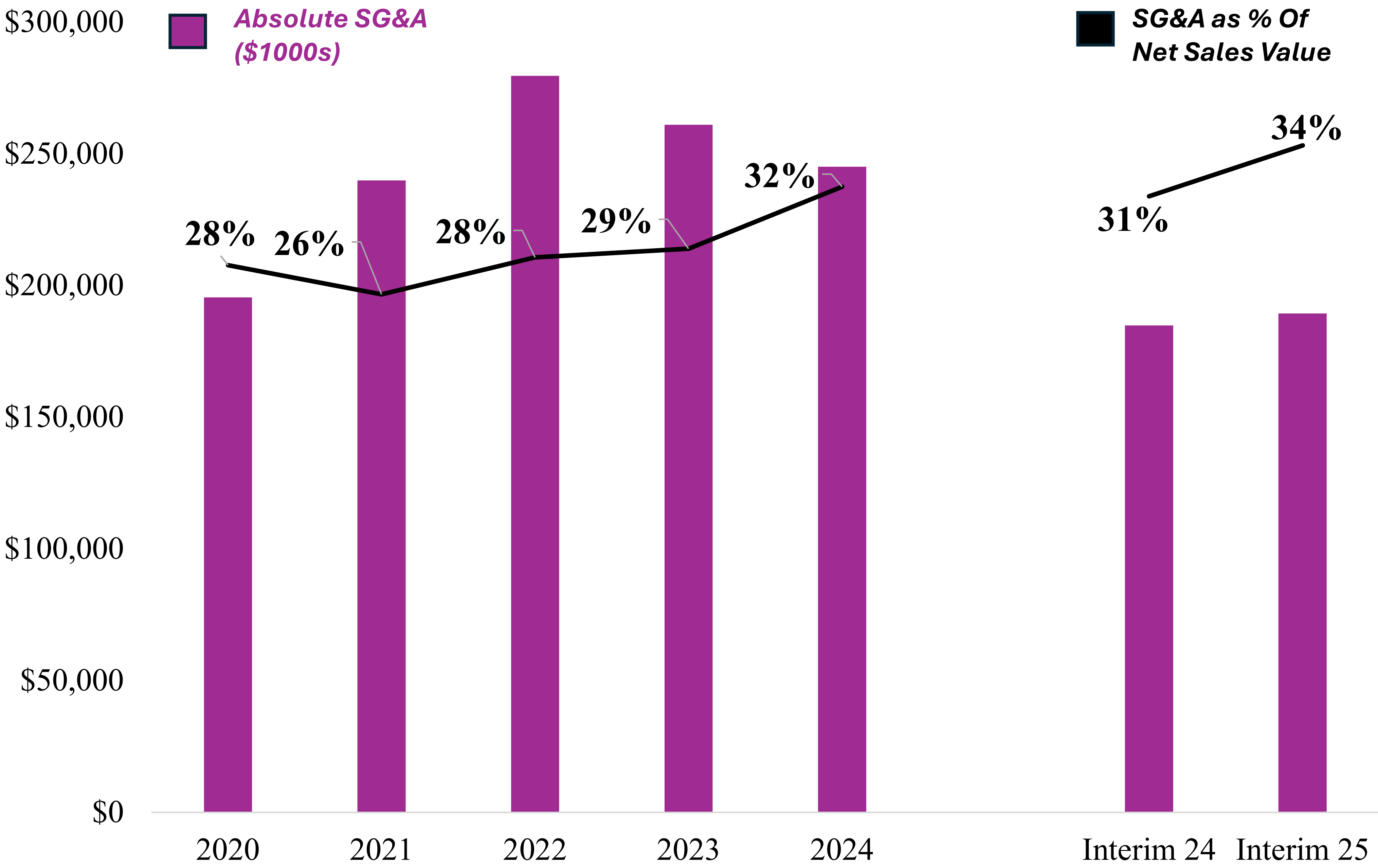
Source: Public Pre-Hearing Report at Table C-1.

Slab Producers' Gross Profit Margins Are Extremely Strong



Source: Public Pre-Hearing Report at Table C-1.

Slab Producers' SG&A Is High and Increasing, Indicating Continued Investment in Their Brands



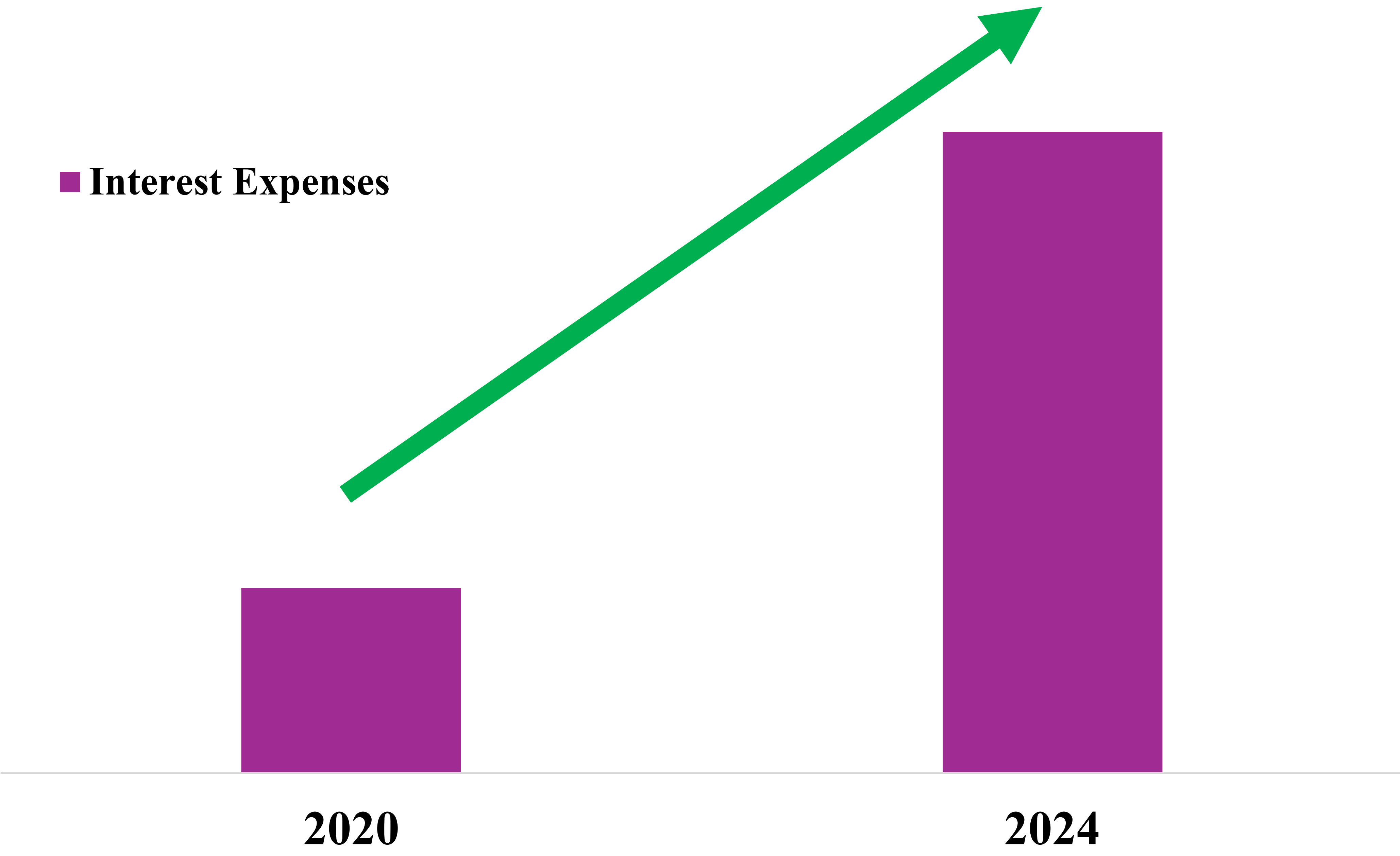
Source: Public Pre-Hearing Report at Table 4.1.

Slab Producers Continued to Grow and Invest

- **$391 million** of capital expenditures over the POI.
  - Capex exceeded depreciation over the POI.
  - Capex nearly **doubled** from interim 2024 to 2025.
- From 2020 to 2024:
  - Net assets increased
  - Installed capacity increased
  - R&D increased
- Several new entrants in the market

Source: Public Pre-Hearing Report at Table C-1; Table 3.4; Table 4.1.

Commission Should Look At Interest Expenses



Source: Data is indicative only; Pre-Hearing Brief of Arizona Tile LLC, Elite Quartz Mfg., and M S International, Inc at 62-63.