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February 18, 2026

Via Electronic Filing

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

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

Total Number of Pages: 27

PUBLIC VERSION

**BUSINESS PROPRIETARY
INFORMATION HAS BEEN REMOVED
from pages 5-8**

**Re: Quartz Surface Products: Prehearing Brief of C&C North America, Inc.,
Cosentino Industrial S.A.U., and Stone Suppliers, Inc.**

Dear Secretary Barton,

On behalf of C&C North America, Inc., (“C&C North America”), Cosentino Industrial S.A.U. (“Cosentino Industrial”), and Stone Suppliers, Inc. (“Stone Suppliers”¹), collectively “Cosentino” or “the Companies,” we hereby submit this prehearing brief with respect to the injury determination to be made by the U.S. International Trade Commission (the “Commission”) in the above-captioned investigation. This brief is timely filed in accordance with the Commission’s notice of institution and scheduling.² In accordance with section

¹ Stone Suppliers, Inc. is the parent company of Carrara Stone Systems of Chicago, LLC, Stone Made Products, Inc., Stone Systems and Services, Inc., Stone Systems of Atlanta, LLC, Stone Systems of Central Texas, LLC, Stone Systems of Houston, LLC, Stone Systems of New Jersey, LLC, Stone Systems of New Mexico, LLC, Stone Systems of Raleigh, LLC, and Stone Systems of South Florida, LLC.

² Quartz Surface Products; Institution of Investigation, Scheduling of Public Hearings, and Determination That the Investigation Is Extraordinarily Complicated, 90 Fed. Reg. 55165 (Dec. 1, 2025).

201.8(d) of the Commission Regulations (19 C.F.R. § 201.8(d)), we are filing this pre-hearing brief electronically and it has been served electronically on all parties.

Pursuant to Section 201.6 of the Commission Regulations (19 C.F.R. § 201.6), we request business confidential treatment for certain information designated in brackets in the attached submission. This includes confidential information regarding financial performance and company health. Disclosure of this information, which is not otherwise publicly available, would cause substantial harm to the competitive position of the parties that placed such information on the record on a confidential basis and would impair the ability of the Commission to obtain information in the future necessary to fulfill its statutory functions.

The required certification that substantially identical information is not available to the public is set forth as an attachment to this letter in accordance with section 201.6(b)(3)(iii) of the Commission Regulations (19 C.F.R. § 201.6(b)(3)(iii)).

Pursuant to section 201.8(f) of the Commission Regulations (19 C.F.R. § 201.8(f)), the Companies are preparing a non-confidential version of this submission. Further, in accordance with section 207.3(c) (19 C.F.R. § 207.3(c)), the Companies will file the non-confidential version of this submission on February 18, 2026, which is the next business day after the confidential version is filed. In addition, copies of the non-confidential version will be served on the parties shown on the attached certificate of service.

Thank you for your attention to this matter. If you have any questions regarding this submission, please contact the undersigned.

Respectfully submitted,

A handwritten signature in black ink that reads "Michael E. Murphy". The signature is written in a cursive style with a large initial "M".

Michael E. Murphy
John M. Foote
Gwendolyn Ellis-Joyce

SIDLEY AUSTIN LLP
Attorneys for C&C North America,
Inc., Cosentino Industrial S.A.U.,
and Stone Suppliers, Inc.

COMPANY CERTIFICATION

I, Leocadia Barnes Sanchez, General Counsel and Corporate Secretary at C&C North America, Inc., certify that (1) I have read the enclosed submission (except for portions containing business proprietary information of other parties), and (2) the information contained in this submission (to the extent I have access) is, to the best of my knowledge, complete and accurate.

Signed by:

Leocadia Barnes Sanchez

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Leocadia Barnes Sanchez
General Counsel and Corporate
Secretary of C&C North America,
Inc., on behalf of C&C North
America, Inc., Cosentino Industrial
S.A.U., and Stone Suppliers, Inc.

Dated: February 17, 2026

CERTIFICATION

I, Michael E. Murphy, of Sidley Austin LLP, counsel to C&C North America, Inc., Cosentino Industrial S.A.U., and Stone Suppliers, Inc., certify, pursuant to 19 C.F.R. § 207.3(a), that (1) I have read the attached submission, and (2) the information contained in this submission is accurate and complete to the best of my knowledge.

In accordance with 19 C.F.R. § 201.6(b)(3)(iii), I further certify that information substantially identical to the information for which we are requesting confidential treatment in the attached submission is not available to the public.

A handwritten signature in black ink that reads "Michael E. Murphy". The signature is written in a cursive style and is positioned above a horizontal line.

Michael E. Murphy

Dated: February 17, 2026

PUBLIC CERTIFICATE OF SERVICE

I, Gwendolyn Ellis-Joyce, hereby certify that the attached public submission was served via electronic mail on February 18, 2026, on the following parties on the public service list for these investigations:

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Gwendolyn Ellis-Joyce

**BEFORE THE
UNITED STATES INTERNATIONAL TRADE COMMISSION**

In the Matter of:

Quartz Surface Products

Investigation No. TA-209-79 (Injury)

PUBLIC VERSION

**PROPRIETARY INFORMATION
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from pages 5-8**

**PRE-HEARING BRIEF OF
C&C NORTH AMERICA, INC., COSENTINO INDUSTRIAL S.A.U., AND
STONE SUPPLIERS, INC.**

Sidley Austin LLP
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Washington, D.C. 20005
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Counsel for C&C North America,
Inc., Cosentino Industrial S.A.U.,
and Stone Suppliers, Inc.

February 18, 2026

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I. Introduction

Cosentino has served the U.S. market by supplying quartz surface products (“QSP”) and other stone surface products for decades. The Company is heavily invested in the U.S. economy, employing close to 1,200 people across numerous states, in distribution centers and showrooms, in fabrication shops and in corporate roles. U.S. demand for Cosentino’s products, including the Company’s flagship QSP product, Silestone®, has been a slow-growth success story based on the Company’s consistent investment in, and commitment to, the U.S. market over many years. This has recently led Cosentino to increase its investment in the United States by purchasing land in Jacksonville, Florida for the construction of a stone surface products production facility. The Jacksonville facility is projected to cost at least \$270 million to construct. Engineering for the facility is currently underway, and the project is scheduled for completion in late 2029, with production beginning in 2030.³

In this proceeding, the Commission is tasked with determining whether QSP is being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or the threat thereof, to the domestic industry. Stone Suppliers is a domestic fabricator of QSP, and is therefore part of the domestic industry, as that term has been defined in the petition. Because Stone Suppliers depends overwhelmingly on QSP slabs that have been manufactured by Cosentino Industrial and imported by C&C North America, Stone Suppliers (as a current member of the domestic industry) has opposed the petition. Cosentino, with plans to become a domestic producer of QSP slabs by 2030, maintains that any outcome of the petition should

³ “Cosentino Announces Plan to Expand Manufacturing to North America,” *Cosentino.com* (2023), <https://www.cosentino.com/news/cosentino-announces-plan-to-expand-manufacturing-to-north-america/>. The facility, once operational, is expected to employ approximately 180 people.

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avoid imposing tariffs on QSP from Spain. Such a remedy would jeopardize the viability of Cosentino's plans for U.S.-based production.

Notably, the petition does not cite imports from Spain or from the European Union as injurious. In fact, petitioners Cambria and Guidoni confirmed their support for Cosentino's position that no remedy should be imposed on imports of Spain shortly prior to the initiation of this investigation.⁴ As demonstrated further herein, imports of QSP from Spain are not a substantial cause of injury to the domestic industry, as such imports have decreased since 2021, including through 2025. The petitioners' use of 2020 as the first year for the review period is misguided and misleading. Due to supply chain bottlenecks and constraints associated with government-imposed lockdowns during the COVID-19 pandemic, import volumes in 2020 are artificially low when compared with any other year. While imports from certain jurisdictions have increased, using 2020 as the baseline year both creates a false impression of increased imports and distorts the comparison of all import data. If that anomalous year in global trade is omitted, there would be no data to indicate any increase in imports from Spain or from the European Union. A surge of Spanish imports, therefore, cannot have caused injury to the domestic industry.

II. Legal Standard

At this stage in the investigation, the Commission must determine if imports of QSP have entered the United States "in such increased quantities as to be a substantial cause of serious injury, or the threat thereof, to the domestic industry."⁵ Under the safeguards statute,

⁴ *Letter from Marty Davis of Cambria Company LLC to Sr. Paco Cosentino* (Oct. 3, 2025), Exhibit 1; *Letter from Rafel Guidoni to Sr. Paco Cosentino* (Nov. 4, 2025), Exhibit 2.

⁵ 19 U.S.C. § 2252(b)(1)(A).

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“substantial cause” is defined as a “cause which is important and not less than any other cause.”⁶ Similarly, “serious injury” is defined as “a significant overall impairment in the position of a domestic industry,” and may include idling of production facilities, inability to continue operations at a reasonable level of profit, and significant unemployment or underemployment throughout the domestic industry, as well as other economic indicators.⁷

When considering if the domestic industry has been injured, the Commission is not obligated to complete a separate analysis for countries that do not have a trade agreement with the United States. Nevertheless, the Commission frequently acknowledges differing characteristics on a country-by-country basis, particularly in industries where import volumes diverge widely from country to country.⁸ Such is the case here, where imports from Spain and other EU member states have actually been falling across the last five years. When considering imports from Spain and from the EU, there has not been an increase in quantities that could cause injury to the domestic industry, let alone an increase of imports that could serve as the substantial cause of serious injury.

III. Data Considerations Regarding the Period of Investigation

The petitioners have asked the Commission to consider a five-year period from 2020 to 2024 for purposes of this investigation. Notably, the first year in this period is 2020, a year marked by the COVID-19 pandemic which saw factory shutdowns, flagging demand, and supply chain disruptions across the globe. It is not an exaggeration to state that 2020 was an unprecedented year that brought unique and singular challenges to companies worldwide. This

⁶ 19 U.S.C. § 2252(b)(1)(B).

⁷ 19 U.S.C. § 2252(c)(6)(C); 19 U.S.C. § 2252(c)(1)(A).

⁸ See, e.g., *Crystalline Silicon Photovoltaic Cells, Whether or Not Partially or Fully Assembled Into Other Products: Monitoring Developments in the Domestic Industry*, Investigation No. TA-201-075 (Feb. 2020); *Fine Denier Polyester Staple Fiber*, Inv. No. TA-201-78, USITC Pub. 5536 (Aug. 2024).

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unusual year warrants special treatment by the Commission when it comes to data analysis in recognition of the extreme stressors put on companies and economies by the pandemic, which now appear in data.

On numerous instances, the Commission has recognized the unique difficulties that companies faced during 2020 and, as such, acknowledged that data from that year may not be representative of the state of the industry. For example, in Investigation No. TA-201-78, regarding fine denier polyester staple fiber, the Commission specifically solicited views of domestic and foreign producers, as well as purchasers, regarding the impact of the pandemic on the industry. When the Commission found injury, it ultimately based its recommended remedy in that case, a tariff-rate quota, on data from 2019, in recognition that imports in 2020 had dropped due to the pandemic and were not representative of normal rates of importation.⁹

Similarly, the Commission in Investigation No. TA-201-77, regarding fresh, chilled, or frozen blueberries, determined that it should give “greater weight” to data from 2019, as the data from 2020 was “likely affected by the COVID-19 pandemic.”¹⁰ The Commission also acknowledged that negative impacts from the pandemic felt by producers and importers alike were an additional cause of market disruption and financial difficulties in its determination in Investigation No. TA-201-75, regarding crystalline silicon photovoltaic cells, and its decision regarding the extension of safeguard measures in Investigation No. TA-201-76, regarding large

⁹ *Fine Denier Polyester Staple Fiber*, Inv. No. TA-201-78, USITC Pub. 5536 (Aug. 2024), at 78.

¹⁰ *Fresh, Chilled, or Frozen Blueberries*, Inv. No. TA-201-77, USITC Pub. 5164 (Mar. 2021), at 55.

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residential washers.¹¹ All of these decisions demonstrate the Commission’s previous appreciation of the outsized negative impact that COVID-19 had on companies across the globe.

Grappling with the effects of the pandemic are even more important in this investigation, where 2020 acts as the beginning of the period of investigation. In this investigation, the Commission acknowledged that COVID-19 may have had significant impacts on the industry and included specific questions regarding the impact of the pandemic on the businesses of responding domestic producers, foreign producers, and importers. Those responses confirm that 2020 was far from a normal year for everyone in the QSP industry.

Numerous companies reported that COVID-19 had a negative impact on their production and financial performance, with many companies citing [

] . One importer reported that [

] to its decision to [] quartz

products.¹² Another stated that the [] and production

was []¹³ Multiple companies commented

that [] became much more difficult due to [

], with one company stating that [

]¹⁴ Several

¹¹ *Crystalline Silicon Photovoltaic Cells, Whether or Not Partially or Fully Assembled into Other Products*, Inv. No. TA-201-75, USITC Pub. 5266 (Dec. 2021), at 78; *Large Residential Washers: Extension of Action*, Inv. No. TA-201-076, USITC Pub. 5144 (Dec. 2020), at 13.

¹² *Prehearing Staff Report Investigation No. TA-201-79: Quartz Surface Products* (Feb. 9, 2026) (hereafter, “Pre-Hearing Staff Report”) at H.7, response from Express Contractors.

¹³ Prehearing Staff Report at H.9, response from MSI.

¹⁴ Prehearing Staff Report at H.12, response from Santa Margherita.

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companies commented on [] with one company stating that []¹⁵ while

another stated that []

[]¹⁶ Most firms cited the initial stages of the pandemic as a difficult period, but several companies noted that the effects of the pandemic [], in particular difficulties related to []

[]¹⁷ Overall, 6 U.S. producers, 26 foreign producers, and 26 U.S. importers reported impacts stemming from COVID-19.

In addition to the challenges described by companies above, the market was also heavily impacted by COVID-19. Petitioner Cambria stated that COVID-19 resulted in a []

[] but that this effect ended []¹⁸ Similarly, petitioner Dal-

Tile remarked on a []¹⁹ MSI commented that []

[]²⁰ This [] described by importers is another side effect of the pandemic that may result in 2020 being an outlier.

All of these responses point to 2020 being a time of extreme and unusual turmoil throughout the whole of the QSP industry. Using this as the baseline from which the increase in imports is measured would, therefore, result in misattribution of the reason for rising imports, as

¹⁵ Prehearing Staff Report at H.9, response from MSI.

¹⁶ Prehearing Staff Report at H.17, response from Zulite.

¹⁷ Prehearing Staff Report at H.12 and H.11, responses from Caesarstone and Keros Stone, respectively.

¹⁸ Prehearing Staff Report at H.3, response from Cambria.

¹⁹ Prehearing Staff Report at H.3, response from Dal-Tile.

²⁰ Prehearing Staff Report at H.9, response from MSI.

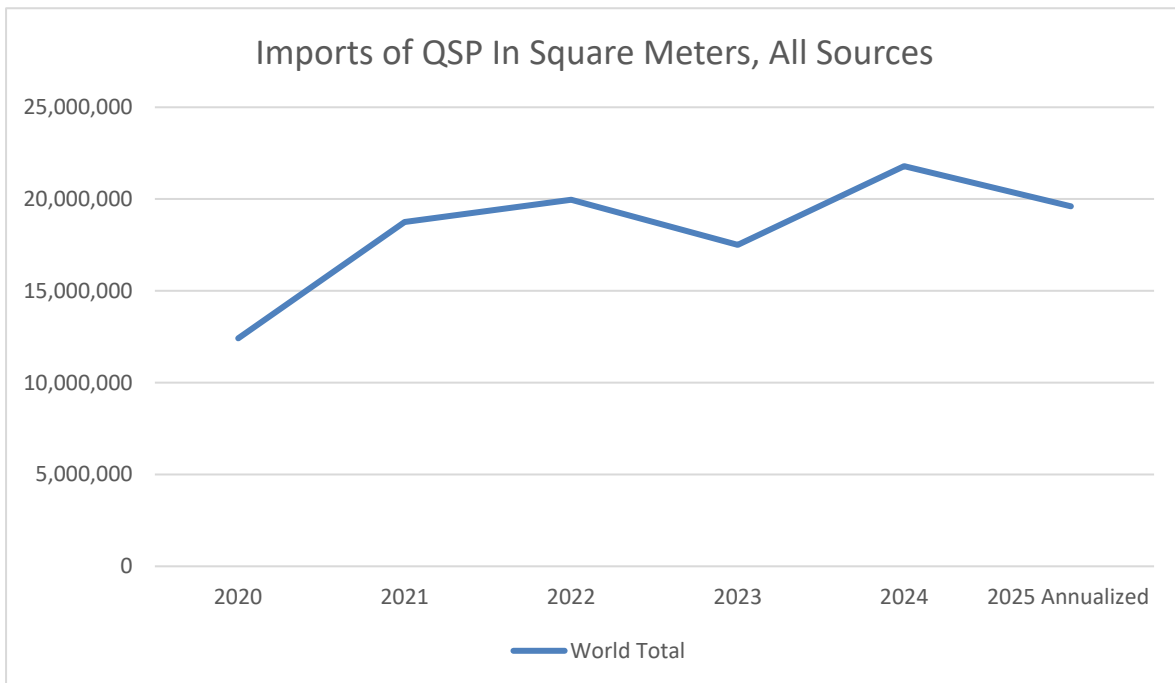
PUBLIC VERSION

imports were [

]. 2020, therefore, is a

year where imports, as well as U.S. production, were impacted by the COVID-19 pandemic and does not represent the health of the QSP industry in normal times.

Cosentino respectfully submits that the Commission should follow past practice by placing greater weight on the data from 2021 and, if necessary, should consider data through 2025, which is now available. This data constitutes a five-year period during which the industry was not disrupted by the pandemic. Rather than using a year when imports had dramatically fallen for reasons beyond any company’s control, it is more reasonable for the Commission to place greater consideration on the years when import activity was not hindered by a once-in-a-century economic distortion.

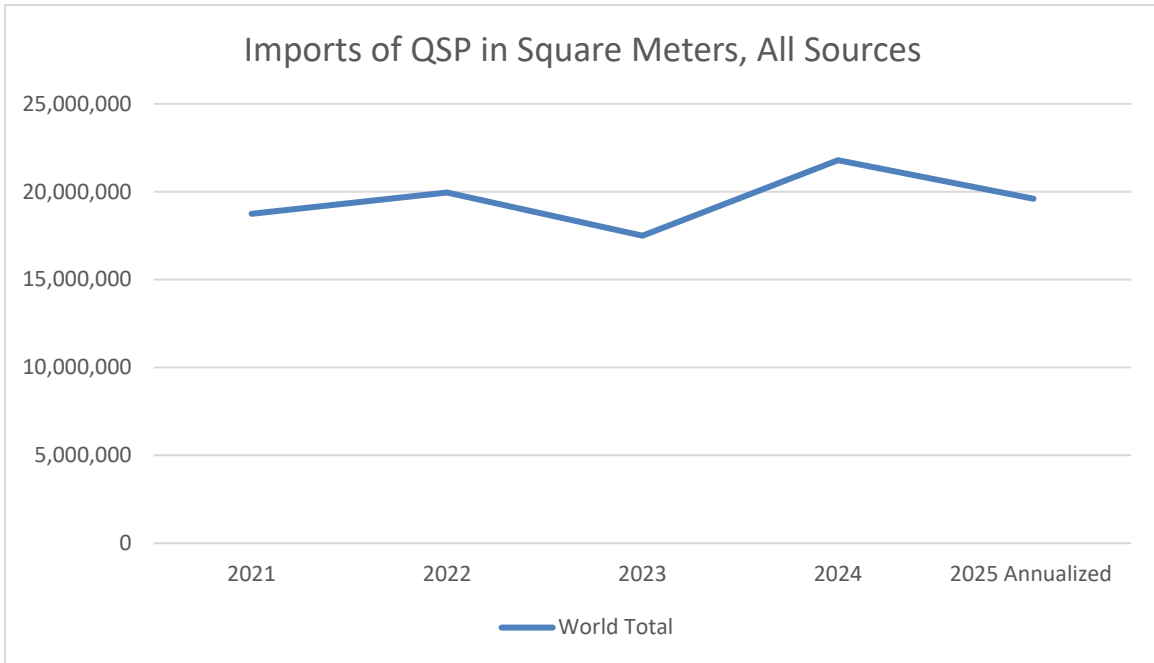


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The above graph depicts the overall increase in U.S. imports between 2020 and 2025.²¹

The increase appears drastic largely due to the depressed level of importation in 2020. When considering imports from 2021 to 2025 in comparison, the overall rise in imports is much more muted, following the contours [

].²²



Given the circumstances the industry was facing in 2020 – unique circumstances which the Commission has repeatedly recognized as having a significant, negative economic impact – and the responses from companies regarding the impacts on their businesses caused by the COVID-19 pandemic, it is clear that 2020 is not a representative year for the QSP industry. As

²¹ US Census data for imports of merchandise classified in 6810.99.0020, 6810.99.0010, and 6810.99.0040, HTSUS. Data for 2025 annualized using available data, which extends through November.

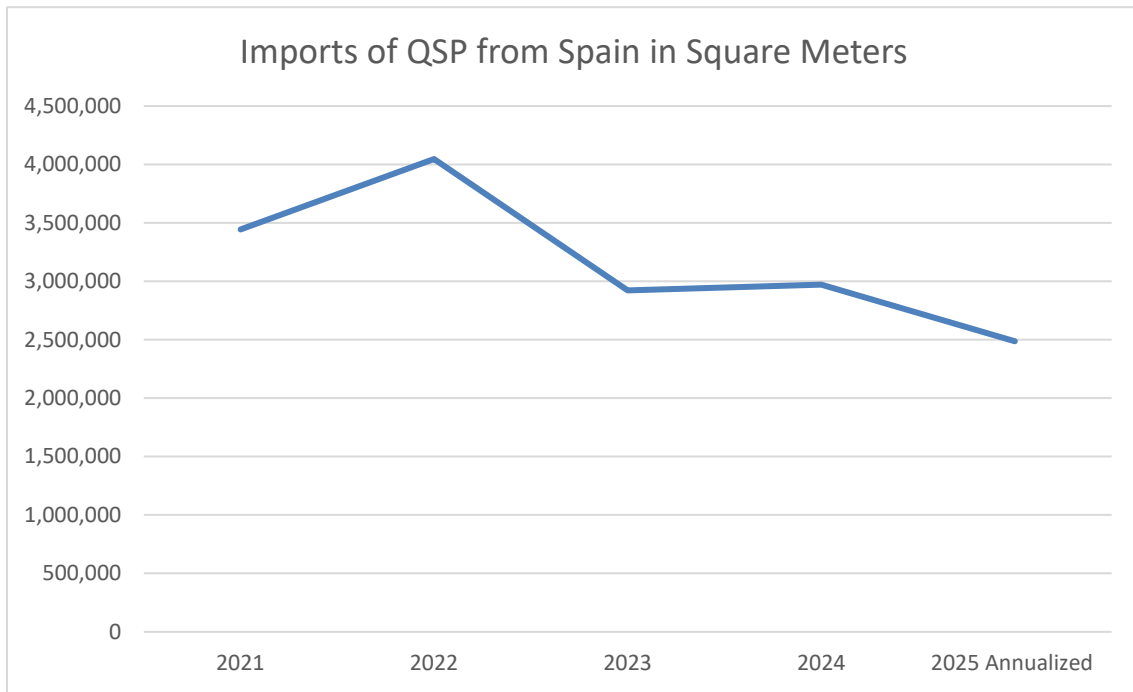
²² *Id.*

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such, the Commission should take care to account for the unusual impact of COVID-19 on the volume of imports throughout the period of investigation.

IV. Imports from Spain and the European Union Have Not Increased and Are Not a Cause of Injury to the Domestic Industry

Imports from Spain and from the European Union, additionally, show a markedly different trend than imports from other parts of the world. On the whole, especially when considering the five years of data from 2021 through 2025 (for which 11 months of data are now available), imports from Spain actually *decreased* by almost 28%:²³



Imports from other EU member states followed a similar downward trend, with imports from Italy, Portugal, the Czech Republic, Germany, and Belgium decreasing from 2021 to 2025.

Overall, imports from the EU declined nearly 37% over these five years, using 2021 as the

²³ *Id.*

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baseline, rather than 2020, when imports were artificially depressed by supply chain disruptions, lockdowns, and exorbitant freight charges.

V. Conclusion

To reach an affirmative injury determination, the Commission must find that imports have not only increased sharply, but also that such increasing imports are a cause of injury to the domestic industry that is not less than any other cause. In making that finding, it is imperative for the Commission to directly address the question of whether it is appropriate to begin with data from a year in which the global economy was marred by a once-in-a-century pandemic that impacted nearly every aspect of business. Because neither import nor production data from 2020 is an adequate representative baseline for trade or productivity, the Commission should disregard the data from that year.

If the Commission is inclined to find injury in this case, Cosentino respectfully urges the Commission to consider the fact that, while global imports may have increased in the aggregate, this increase has been disproportionately distributed across foreign jurisdictions and that imports from Spain and from other EU member states have actually *decreased* over the last five years. There is no basis to find that imports of QSP from Spain or from the European Union increased in “such quantities as to be a substantial cause of serious injury” or a threat thereof to the domestic industry. We respectfully submit that the Commission should recognize as much in its injury determination.

PUBLIC VERSION

For the foregoing reasons, Cosentino submits that the Commission should determine that imports from Spain and the European Union have not increased in quantities that have caused serious injury to the domestic industry.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael E. Murphy". The signature is written in a cursive style with a large, stylized initial "M".

Michael E. Murphy
John M. Foote
Gwendolyn Ellis-Joyce
SIDLEY AUSTIN LLP
Attorneys for C&C North America, Inc.,
Cosentino Industrial S.A.U., and Stone
Suppliers, Inc.

EXHIBIT 1

October 3, 2025

Dear Sr. Paco Cosentino:

We at Cambria are committed to supporting fair and free trade and competition in the quartz surface industry. There has been a rapid surge of Quartz imports, with the majority coming from China, India, Thailand and the entire Pacific Rim. Imports from these countries have rapidly surged from nearly negligible production to overtaking the U.S. domestic industry. Therefore we support the Safeguard Petition filed by The Quartz Manufacturers Alliance of America (QMAA) on September 15, 2025 seeking relief from the surge of imports that is injuring the domestic industry.

We recognize and appreciate producers that have invested or committed to future investments in U.S. manufacturing of quartz surface products. In particular, Cambria commends its Spain-based competitor, Cosentino, for its announced \$270 million investment in slab manufacturing in Jacksonville, Florida. This important step demonstrates the importance of the U.S. market for quartz surface products and the capacity of domestic production and investments in our U.S. free and fair markets.

Given Cosentino's investments in and commitment to U.S. production and the fact that Spanish imports have not accounted for the massive surge of imports, Cambria supports Cosentino's anticipated request for relief from potential tariffs on imports from Spain imposed as a remedy to the Safeguard Petition. We look forward to your building a factory in the U.S. and look forward to welcoming Cosentino into the United States as a U.S. domestic producer.

Sincerely,



Marty Davis
CEO
Cambria Company LLC

Rebecca Shult, CLD
for Marty Davis 10/3/2025

EXHIBIT 2


Dear Sr. Paco Cosentino:

We at Guidoni USA are committed to supporting fair and free trade and competition in the quartz surface industry. There has been a rapid surge of Quartz imports, with the majority coming from China, India, Thailand and the entire Pacific Rim. Imports from these countries have rapidly surged from nearly negligible production to overtaking the U.S. domestic industry. Therefore we support the Safeguard Petition filed by The Quartz Manufacturers Alliance of America (QMAA) on September 15, 2025 seeking relief from the surge of imports that is injuring the domestic industry.

We recognize and appreciate producers that have invested or committed to future investments in U.S. manufacturing of quartz surface products. In particular, Guidoni USA commends its Spain-based competitor, Cosentino, for its announced \$270 million investment in slab manufacturing in Jacksonville, Florida. This important step demonstrates the importance of the U.S. market for quartz surface products and the capacity of domestic production and investments in our U.S. free and fair markets.

Given Cosentino's investments in and commitment to U.S. production and the fact that Spanish imports have not accounted for the massive surge of imports, Guidoni USA supports Cosentino's anticipated request for relief from potential tariffs on imports from Spain imposed as a remedy to the Safeguard Petition. We look forward to your building a factory in the U.S. and look forward to welcoming Cosentino into the United States as a U.S. domestic producer.

Sincerely,


Rafael Guidoni
Date: 11-04-2025