

March 24, 2025

Ambassador Jamieson Greer  
United States Trade Representative  
Office of the United States Trade Representative  
600 17<sup>th</sup> Street, N.W.  
Washington, D.C. 20508

**RE: Opposition to Proposed Action in Section 301 Investigation of China’s Targeting of the Maritime, Logistics, and Shipbuilding Sectors for Dominance (USTR–2025–0003)**

The undersigned organizations representing a wide breadth of our nation’s economy, including importers, exporters, farmers and agribusinesses, retailers, manufacturers, energy providers, wholesalers, transportation and logistics providers, and other sectors, urge the Office of the U.S. Trade Representative (USTR) to refrain from imposing its proposed actions in response to the Section 301 investigation of China’s targeting the maritime, logistics, and shipbuilding sectors for dominance.

We support scrutiny of China’s efforts to dominate the maritime industry. However, USTR’s proposed actions will not deter China’s broader maritime ambitions and will instead directly hurt American businesses and consumers. Specifically, USTR’s proposed fees will increase shipping costs, container and non-containerized, by at least 25% (\$600-\$800 or more), adding approximately \$30 billion in annual costs on U.S. businesses and farmers. This will lead to higher prices for U.S. consumers and undermine the competitiveness of many U.S. exports—leading to a decline in export revenues and increasing the U.S. trade deficit, contrary to the Trump Administration’s America First trade goals. One [recent study](#)<sup>1</sup> on the assessment of probable net economic effects of the proposed remedies found that overall, total exports and imports would decline, negatively impacting the U.S. economy at a time when the administration is striving to grow the overall economy and create jobs around the country.

Ocean carriers will respond to USTR’s fees by reducing service to many U.S. ports and potentially divert cargo to ports in Canada and Mexico based upon customer demand. This will reduce ocean traffic at many smaller ports, creating profound economic damage – including lost jobs – in communities where ports serve as vital economic hubs. Reduction in service will increase congestion across the country’s logistics network and spur a new normal of higher costs and delays affecting both imports and exports. American consumers will suffer a lag in receiving the goods they rely on every day.

We understand USTR is proposing export requirements to support a domestic shipbuilding industry. We also support a domestic shipbuilding industry, but the export requirements outlined by USTR fail to acknowledge the realities of revitalizing a U.S. shipbuilding industry. The U.S. cannot build a vibrant shipbuilding industry from its current capacity in seven years. Holding firm to USTR’s proposal would force a reduction in U.S. exports, since the capacity does not exist nor will exist under the USTR timelines. To achieve the twin goals of combatting trade deficits and reinvigorating the U.S. shipbuilding industry, we need a dedicated strategy with sustained investments, leadership, and a long-term commitment

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<sup>1</sup>[The Economic Effects of Proposed Action in the Section 301 Investigation of China’s Maritime, Logistics, and Shipbuilding Policies and Practices](#), Trade Partnership Worldwide, LLC March 2025

from both the public and private sectors. We encourage the Administration to work with us to achieve its broader goals by considering alternative and more effective measures.

We share the goal of finding real remedies to address China's dominance in the maritime industry, while also revitalizing the U.S. shipbuilding industry. We strongly urge USTR to reconsider the proposed remedies which will significantly impact the millions of stakeholders who rely on efficient maritime services to move goods in and out of the United States.

Thank you for the opportunity to comment.

Sincerely,

Agribusiness Council of Indiana	Arkansas Soybean Association
Agricultural and Food Transporters Conference	Associated Builders and Contractors
Agricultural Retailers Association	Associated Equipment Distributors
Agriculture Transportation Coalition - AgTC	Association of Equipment Manufacturers (AEM)
Air-Conditioning, Heating and Refrigeration Institute	Association of Food Industries
Airforwarders Association	Association of Home Appliance Manufacturers (AHAM)
Alliance for Chemical Distribution	Auto Care Association
Almond Alliance	Autos Drive America
Amcot	Baltimore Customs Brokers and Forwarders Association
American Apparel & Footwear Association (AAFA)	Big River Coalition
American Association of Exporters and Importers	Boston Custom Brokers & Freight Forwarders Association
American Association of Port Authorities	Business Alliance for Customs Modernization
American Bridal and Prom Industry Association	C.I.A.A. Cheese Importers Association of America
American Chemistry Council	California Association of Wheat Growers
American Clean Power Association	California Building Industry Association
American Cleaning Institute	California Bean Shippers Association
American Composites Manufacturers Association	California Chamber of Commerce
American Cotton Shippers Association	California Cotton Ginners and Growers Association
American Down and Feather Council	California Retailers Association
American Forest & Paper Association	California Trucking Association
American Hardwood Export Council	California Walnut Commission
American Home Furnishings Alliance	California Wheat Commission
American Logistics Association	CAWA - Representing the Automotive Parts Industry
American Pet Products Association	Center for LNG
American Pistachio Growers	Chamber of Shipping of America
American Pulse Association	Clean Fuels Alliance America
American Pyrotechnics Association	Coalition for GSP
American Soybean Association	Coalition of New England Companies for Trade
American Spice Trade Association	Color Pigments Manufacturers Association
American Trucking Associations	Colorado Retail Council
American Waterways Operators	Columbia River Customs Brokers & Forwarders Association
AmericanHort	

Columbia River Steamship Operators' Association, Inc.  
 Connecticut Retail Network  
 Consumer Technology Association (CTA)  
 Corn Refiners Association  
 Council of Fashion Designers of America (CFDA)  
 Council of Supply Chain Management Professionals (CSCMP)  
 Customs Broker and Freight Forwarder Association of Northern California  
 Customs Brokers and International Freight Forwarders Association of Washington State  
 Distilled Spirits Council of the United States  
 Edible Oil Producers Association  
 Exhibition Services & Contractors Association  
 Exhibitions & Conferences Alliance  
 Experiential Designers & Producers Association  
 Fashion Accessories Shippers Association  
 Florida Retail Federation  
 Florida Trucking Association  
 FMI - the Food Industry Association  
 Footwear Distributors & Retailers of America (FDRA)  
 Forest Resources Association  
 Gemini Shippers Association  
 Georgia Green Industry Association, Inc.  
 Georgia Retailers  
 Global Business Alliance  
 Global Cold Chain Alliance  
 Grain and Feed Association of Illinois  
 Greater New Orleans, Inc.  
 Greenabl Shippers Association  
 Greeting Card Association  
 Growth Energy  
 Halloween & Costume Association  
 Harbor Trucking Association  
 Hardwood Federation  
 Health Industry Distributors Association (HIDA)  
 Heating, Air-conditioning, & Refrigeration Distributors International  
 Home Fashion Products Association  
 Home Furnishings Association  
 Household & Commercial Products Association  
 Houston Customs Brokers Association  
 Idaho Grain Producers Association  
 Idaho Wheat Commission  
 Illinois Retail Merchants Association  
 Illinois Soybean Growers  
 Independent Freight Forwarders & Customs Brokers Association of Savannah, Inc.  
 Indiana Retail Council  
 Intermodal Association of North America  
 Intermodal Motor Carriers Conference  
 International Association of Exhibitions and Events  
 International Association of Movers  
 International Association of Venue Managers  
 International Dairy Foods Association  
 International Food Additives Council  
 International Foodservice Distributors Association  
 International Freight Forwarders & Customs Brokers Association New Orleans  
 International Fresh Produce Association  
 International Housewares Association  
 International Housewares Shippers Association (IHSA)  
 International Warehouse Logistics Association (IWLA)  
 International Wood Products Association  
 Iowa Soybean Association  
 JFK Airport Customs Brokers and Freight Forwarders Association  
 Juvenile Products Manufacturers Association  
 Kansas Agribusiness Retailers Association  
 Kansas Association of Wheat Growers  
 Kansas Grain and Feed Association  
 Kansas Sorghum Producers  
 Kansas Soybean Association  
 Kentucky Forest Industries Association  
 Kentucky Retail Federation  
 Kentucky Soybean Association  
 Landscape Illinois: The Statewide Association for Landscape Professionals  
 Leather and Hide Council of America  
 Licensing International  
 Lone Star Agribusiness Association  
 Los Angeles Area Chamber of Commerce  
 Los Angeles Customs Brokers and Freight Forwarders Association  
 Maple Flooring Manufacturers Association  
 Maritime Fire & Safety Association  
 Maryland Retailers Alliance  
 Meat Import Council of America  
 Meat Institute  
 MEMA, The Vehicle Suppliers Association  
 Methanol Institute  
 Michigan Agri-Business Association

Michigan Soybean Association  
 Mid-Valley Customs Brokers Association  
 Minnesota Grain and Feed Association  
 Minnesota Retailers Association  
 Minnesota Soybean Growers Association  
 Mississippi Soybean Association  
 Missouri Retailers Association  
 Missouri Soybean Association  
 Montana Grain Growers Association  
 Montana Mining Association  
 Motorcycle Industry Council  
 National Aquaculture Association  
 National Asphalt Pavement Association  
 National Association of Beverage Importers  
 National Association of Egg Farmers  
 National Association of Foreign-Trade Zones  
 National Association of Manufacturers (NAM)  
 National Association of State Departments of  
     Agriculture  
 National Association of Wheat Growers  
 National Coffee Association, USA  
 National Confectioners Association  
 National Corn Growers Association  
 National Cotton Council  
 National Council of Chain Restaurants  
 National Council of Farmer Cooperatives  
 National Customs Brokers and Forwarders  
     Association of America (NCBFAA)  
 National Fisheries Institute  
 National Foreign Trade Council (NFTC)  
 National Grain and Feed Association  
 National Industrial Transportations League  
 National Lumber & Building Material Dealers  
     Association  
 National Milk Producers Federation  
 National Mining Association  
 National Oilseed Processors Association  
 National Onion Association  
 National Pasta Association  
 National Peach Council  
 National Pork Producers Council  
 National Potato Council  
 National Retail Federation  
 National Sorghum Producers  
 National Stone, Sand & Gravel Association  
 National Turkey Federation  
 NC AgriBusiness Council  
 NC Sweetpotato Commission  
 NCBFAA Shippers Association  
 Nebraska Soybean Association  
 Nebraska Trucking Association  
 Nevada Trucking Association  
 New England Lumbermen's Association  
 New Jersey Motor Truck Association  
 New Jersey Retail Merchants Association  
 New York Corn & Soybean Growers Association  
 New York New Jersey Foreign Freight  
     Forwarders and Brokers Association, Inc.  
 North American Association of Food Equipment  
     Manufacturers (NAFEM)  
 North American Export Grain Association  
 North American Home Furnishings Association  
 North American Olive Oil Association  
 North American Renderers Association  
 North Carolina Retail Merchants Association  
 North Carolina Soybean Producers Association  
 North Dakota Agricultural Association  
 North Dakota Grain Dealers Association  
 North Dakota Grain Growers Association  
 North Dakota Soybean Growers Association  
 North Dakota Wheat Commission  
 North Texas Customs Brokers and Freight  
     Forwarders Association  
 Northeast Agribusiness & Feed Alliance  
 Northern Border Customs Brokers Association (NBCBA)  
 Ohio AgriBusiness Association  
 Ohio Soybean Association  
 Oklahoma Agricultural Cooperative Council, Inc.  
 Oregon Association of Nurseries  
 Oregon Business & Industry  
 Oregon Trucking Association  
 Oregon Wheat Growers League  
 Outdoor Industry Association  
 Outdoor Power Equipment Institute  
 Pacific Coast Council of Customs Brokers and  
     Freight Forwarders Assns. Inc.  
 Pacific Maritime Association  
 Pacific Northwest Asia Shippers Association – PNASA  
 Pacific Northwest Waterways Association  
 Peanut and Tree Nut Processors Association  
 Penn York Lumberman's  
 Pennsylvania Coal Alliance  
 Pennsylvania Landscape & Nursery Association  
 Pennsylvania Retailers Association  
 Performance Racing Industry (PRI)  
 Personal Care Products Council  
 Pet Advocacy Network  
 Pet Food Institute

Pet Industry Distributors Association  
Plumbing Manufacturers International  
Portland Cement Association  
Potato Growers of Michigan, Inc.  
PPAI - Promotional Products Association  
International  
PRINTING United Alliance  
Recreational Off-Highway Vehicle Association  
Renew Kansas Biofuels Association  
Renewable Fuels Association  
Retail Association of Nevada  
Retail Council of New York State  
Retail Industry Leaders Association (RILA)  
Retail Merchants of Hawaii  
Retailers Association of Massachusetts  
RI Trucking Association  
San Diego Customs Broker Association  
San Francisco Bar Pilots  
Society of Independent Show Organizers  
South Carolina Retail Association  
South Carolina Trucking Assoc., Inc.  
South Dakota Agri-Business Association  
South Dakota Association of Cooperatives  
South Dakota Soybean Association  
Southwest Meat Association  
Soy Transportation Coalition  
Specialty Equipment Market Association  
(SEMA)  
Specialty Soya and Grains Alliance  
Specialty Vehicle Institute of America  
Specialized Furniture Carriers  
Sports & Fitness Industry Association  
Tea Association of the U.S.A., Inc.  
Tennessee Mining Association  
Tennessee Soybean Association  
Texas Grain & Feed Association  
Texas International Produce Association  
Texas Retailers Association  
Texas Wheat Producers Association  
The Chamber of Marine Commerce  
The Fashion Jewelry and Accessories Trade  
Association  
The Fertilizer Institute  
The Game Manufacturers Association  
The Hardwood Federation  
The National Hay Association  
The National Mining Association  
The Sulphur Institute  
The Toy Industry Association, Inc  
Toy Shippers Association (TOYSA)  
Travel Goods Association  
Trucking Association of New York  
U S Sweet Potato Council  
U.S. Apple Association  
U.S. Chamber of Commerce  
U.S. Dairy Export Council  
U.S. Fashion Industry Association  
U.S. Forage Export Council  
U.S. Meat Export Federation  
U.S. Pea & Lentil Trade Association  
U.S. Wheat Associates  
UFI - The Global Association of the Exhibition Industry  
United States Council for International  
Business (USCIB)  
USA Dry Pea & Lentil Council  
USA Poultry & Egg Export Council  
USA Rice  
Virginia Grain Producers Association  
Virginia Retail Federation  
Virginia Soybean Association  
Washington Association of Wheat Growers  
Washington Grain Commission  
Washington State Potato Commission  
Washington Trucking Associations  
Waterways Council, Inc.  
West Texas New Mexico Customs Brokers Association  
West Virginia Forestry Association  
Western Hardwood Association  
Western Tree Nut Association  
Wine and Spirits Shippers Association, Inc.  
Wisconsin Soybean Association  
World Pet Association  
World Trade Center New Orleans  
Wyoming Ag Business Association  
Wyoming Mining Association  
Wyoming Wheat Marketing Commission