

March 24, 2025

Ambassador Jamieson Greer
United States Trade Representative
Office of the United States Trade Representative
600 17th 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](#)¹ 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

¹ [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

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 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
Agricultural and Food Transporters Conference
Agricultural Retailers Association
Agriculture Transportation Coalition - AgTC
Air-Conditioning, Heating and Refrigeration
Institute
Airforwarders Association
Alliance for Chemical Distribution
Almond Alliance
Amcot
American Apparel & Footwear Association
(AAFA)
American Association of Exporters and
Importers
American Association of Port Authorities
American Bridal and Prom Industry
Association
American Chemistry Council
American Clean Power Association
American Cleaning Institute
American Composites Manufacturers
Association
American Cotton Shippers Association
American Down and Feather Council
American Forest & Paper Association
American Hardwood Export Council
American Home Furnishings Alliance
American Logistics Association
American Pet Products Association
American Pistachio Growers
American Pulse Association
American Pyrotechnics Association

American Soybean Association
American Spice Trade Association
American Trucking Associations
American Waterways Operators
AmericanHort
Arkansas Soybean Association
Associated Equipment Distributors
Association of Equipment Manufacturers (AEM)
Association of Food Industries
Association of Home Appliance Manufacturers (AHAM)
Auto Care Association
Autos Drive America
Baltimore Customs Brokers and Forwarders
Association
Big River Coalition
Boston Custom Brokers & Freight Forwarders
Association
Business Alliance for Customs Modernization
California Association of Wheat Growers
California Building Industry Association
California Chamber of Commerce
California Cotton Ginners and Growers
Association
California Retailers Association
California Trucking Association
California Walnut Commission
California Wheat Commission
CAWA - Representing the Automotive Parts
Industry
Center for LNG
Chamber of Shipping of America
Clean Fuels Alliance America

Coalition of New England Companies for Trade	Heating, Air-conditioning, & Refrigeration Distributors International
Color Pigments Manufacturers Association	Home Fashion Products Association
Colorado Retail Council	Home Furnishings Association
Columbia River Customs Brokers & Forwarders Association	Household & Commercial Products Association
Consumer Technology Association (CTA)	Houston Customs Brokers Association
Corn Refiners Association	Idaho Grain Producers Association
Council of Fashion Designers of America (CFDA)	Idaho Wheat Commission
Council of Supply Chain Management Professionals (CSCMP)	Illinois Retail Merchants Association
Ct Retail Network	Illinois Soybean Growers
Customs Broker and Freight Forwarder Association of Northern California	Independent Freight Forwarders & Customs Brokers Association of Savannah, Inc.
Customs Brokers and International Freight Forwarders Association of Washington State	Indiana Retail Council
Distilled Spirits Council of the United States	Intermodal Association of North America
Edible Oil Producers Association	Intermodal Motor Carriers Conference
Exhibition Services & Contractors Association	International Association of Exhibitions and Events
Exhibitions & Conferences Alliance	International Association of Movers
Experiential Designers & Producers Association	International Association of Venue Managers
Fashion Accessories Shippers Association	International Dairy Foods Association
Florida Retail Federation	International Food Additives Council
Florida Trucking Association	International Foodservice Distributors Association
FMI - the Food Industry Association	International Freight Forwarders & Customs Brokers Association New Orleans
Footwear Distributors & Retailers of America (FDRA)	International Fresh Produce Association
Forest Resources Association	International Housewares Association
Gemini Shippers Association	International Housewares Shippers Association (IHSA)
Georgia Green Industry Association, Inc.	International Warehouse Logistics Association (IWLA)
Georgia Retailers	International Wood Products Association
Global Business Alliance	JFK Airport Customs Brokers and Freight Forwarders Association
Global Cold Chain Alliance	Juvenile Products Manufacturers Association
Grain and Feed Association of Illinois	Kansas Agribusiness Retailers Association
Greater New Orleans, Inc.	Kansas Association of Wheat Growers
Greenabl Shippers Association	Kansas Grain and Feed Association
Greeting Card Association	Kansas Soybean Association
Growth Energy	Kentucky Forest Industries Association
Halloween & Costume Association	Kentucky Soybean Association
Harbor Trucking Association	Landscape Illinois: The Statewide Association for Landscape Professionals
Hardwood Federation	Licensing International
Health Industry Distributors Association (HIDA)	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
Missouri Retailers 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 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 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 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 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
Peanut and Tree Nut Processors Association
Penn York Lumberman's
Pennsylvania Coal Alliance
Pennsylvania Landscape & Nursery Association
Pennsylvania Retailers Association

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