

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 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

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

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