

July 7, 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: Request for Comments Concerning Proposed Modification of Action Pursuant to the Section 301 Investigation of China's Targeting of the Maritime, Logistics, and Shipbuilding Sectors for Dominance (USTR-2025-0013)**

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 again 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.

As we previously submitted<sup>1</sup> to USTR during the initial comment period, the groups support scrutiny of China's efforts to dominate the maritime industry. However, we still strongly believe that USTR's final actions will not deter China's broader maritime ambitions and will instead directly hurt American businesses and consumers. While we appreciate that USTR made significant changes to the final actions, the port fee remains in place. These fees will be passed along directly to the cargo owners, U.S. importers and exporters to pay.

BIMCO, the Baltic and International Maritime Council, the world's largest international shipping association, recently announced<sup>2</sup> that it has initiated the development of a standard industry clause with the aim to address contractual uncertainties arising from USTR's actions to impose fees on Chinese-related ships calling U.S. ports. As we previously stated, this will lead to higher prices for U.S. consumers and undermine the competitiveness of many U.S. businesses.

We continue to expect ocean carriers to rearrange and potentially reduce services to U.S. ports, especially smaller ports, as a result of the port fee. Such a 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. This will also negatively impact local economies, businesses and workers who rely on these ports.

We again call upon USTR and the administration to evaluate the true needs to support the revitalization of the domestic shipbuilding industry. There continues to need to be a dedicated strategy with sustained investments, leadership and a long-term commitment from both the public and private sectors to revitalize the domestic industry, without the need of a port fee on Chinese-built vessels that were purchased years ago.

Thank you for the opportunity to comment.

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<sup>1</sup>[USTR-2025-0002-00111875](#), March 24, 2025

<sup>2</sup> [BIMCO to develop standard clause addressing USTR uncertainties](#), June 5, 2025

Sincerely,

Agribusiness Council of Indiana  
Agricultural Retailers Association  
Agriculture Transportation Coalition  
Air-Conditioning, Heating, and Refrigeration  
Institute  
Airforwarders Association  
Alliance for Automotive Innovation  
Alliance for Chemical Distribution  
Alliance of Wisconsin Retailers  
Amcot  
American Apparel & Footwear Association  
(AAFA)  
American Association of Exporters and  
Importers  
American Association of Port Authorities  
American Bakers Association  
American Chemistry Council  
American Composites Manufacturers  
Association  
American Cotton Shippers Association  
American Down and Feather Council  
American Home Furnishings Alliance  
American Logistics Association  
American Pet Products Association  
American Pyrotechnics Association  
American Seed Trade Association (ASTA)  
American Soybean Association  
AmericanHort  
Associated Equipment Distributors  
Association of Food Industries  
Auto Care Association  
Autos Drive America  
Baby Safety Alliance (formerly Juvenile  
Products Manufacturers Association)  
Bay Area Council  
California Association of Wheat Growers  
California Building Industry Association  
California Chamber of Commerce  
California Retailers Association  
California Walnut Commission  
California Warehouse Association  
Can Manufacturers Institute  
CAWA - Representing the Automotive Parts  
Industry  
Color Pigments Manufacturers Association  
Columbia River Steamship Operators'  
Association

Consumer Technology Association  
Council for Responsible Nutrition  
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 & International Freight Forwarders  
Association of Washington State  
Exhibitions & Conferences Alliance  
Experiential Designers & Producers Association  
Fashion Accessories Shippers Association  
Florida Retail Federation  
FMI - the Food Industry Association  
Footwear Distributors & Retailers of America (FDRA)  
Gemini Shippers Association  
Georgia Retailers  
Global Business Alliance  
Green Coffee Association  
Greenabl Shippers Association  
Growth Energy  
Halloween & Costume Association  
Home Fashion Products Association  
Household & Commercial Products Association  
Illinois Retail Merchants Association  
Institute of Makers of Explosives  
Intermodal Motor Carriers Conference  
International Association of Exhibitions and Events  
International Association of Movers  
International Casual Furnishings Association  
International Fresh Produce Association  
International Housewares Association  
International Housewares Shippers Association (IHSA)  
International Warehouse Logistics Association (IWLA)  
International Wood Products Association  
Kansas Soybean Association  
Los Angeles Customs Brokers and Freight  
Forwarders Association  
Michigan Agri-Business Association  
Michigan Bean Shippers  
Minnesota Retailers Association  
Minnesota Soybean Growers Association  
Mississippi Farm Bureau Federation  
Mississippi Soybean Association  
Missouri Retailers Association  
Montana Grain Growers Association  
NAIOP Inland Empire Chapter

National Asphalt Pavement Association	Retail Industry Leaders Association
National Association of Beverage Importers	Retailers Association of Massachusetts
National Association of Foreign Trade Zones	San Diego Customs Broker Association
National Association of Manufacturers	Society of Independent Show Organizers, SISO
National Association of Music Merchants	South Dakota Agri-Business Association
National Association of Wheat Growers	South Dakota Soybean Association
National Association of Wholesaler-Distributors	Soy Transportation Coalition
National Cotton Council	Specialty Equipment Market Association (SEMA)
National Council of Chain Restaurants	Specialty Soya & Grains Alliance
National Council of Farmer Cooperatives	Sports & Fitness Industry Association
National Customs Brokers and Forwarders Association of America (NCBFAA)	Tag and Label Manufacturers Institute
National Fisheries Institute	Tea Association of the U.S.A., Inc.
National Foreign Trade Council	Texas Grain & Feed Association
National Industrial Transportation League	Texas International Produce Association
National Milk Producers Federation	The Business Council of New York State, Inc.
National Retail Federation	The Fashion Jewelry and Accessories Trade Association
National Stone, Sand & Gravel Association	The Fertilizer Institute
National Turkey Federation	The Game Manufacturers Association
NC AgriBusiness Council	The Hardwood Federation
NC Retail Merchants Association	The Sulphur Institute
NCBFAA Shippers Association	Toy Shippers Association (TOYSA)
North America Fashion Apparel Association	Travel Goods Association (TGA)
North American Association of Food Equipment Manufacturers (NAFEM)	U.S. Apple Association
North American Home Furnishings Association	U.S. Chamber of Commerce
North Carolina Soybean Producers Association	U.S. Dairy Export Council
Northern California District Export Council	U.S. Fashion Industry Association
New York New Jersey Foreign Freight Forwarders and Brokers Association Inc.	U.S. Meat Export Federation
Ohio AgriBusiness Association	UFI The Global Association for the Exhibition Industry
Pacific Northwest Waterways Association	United States Council for International Business (USCIB)
Peanut and Tree Nut Processors Association	USA Rice
Pennsylvania Landscape & Nursery Association	Vermont Retail and Grocers Association
Personal Care Products Council	Virginia Grain Producers Association
Pet Advocacy Network	Virginia Retail Federation
Pet Industry Distributors Association	Washington State Potato Commission
Plumbing Manufacturers International	Washington Trucking Associations
PRINTING United Alliance	Waterways Council, Inc.
Promotional Products Association International (PPAI)	West Virginia Forestry Association
	Window and Door Manufacturers Association
	Wisconsin Soybean Association
	Wyoming Ag Business Association
	Wyoming Mining Association
	Wyoming Wheat Growers Association
	Wyoming Wheat Marketing Commission