

July 7, 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: 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 submitted¹ 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 announced² 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.

¹[USTR-2025-0002-00111875](#), March 24, 2025

² [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