November 7, 2025

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Docket Number: USTR-2025-0274

Ambassador Jamieson Greer
Office of the United States Trade Representative
600 17th Street NW
Washington, D.C. 20508

RE: Docket Number USTR-2025-0274, **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."**

Dear Ambassador Greer:

As co-petitioners of the Section 301 petition regarding China's Acts, Policies, and Practices Targeting the Maritime, Logistics and Shipbuilding Sectors aimed at global dominance, we write to express our strong disappointment at the administration's decision to step back from its commitment to addressing China's discriminatory activity in these sectors. Suspending implementation of the responsive actions under the Section 301 investigation will continue to give China a free pass on its predatory behavior and will have far-reaching negative consequences as we attempt to restore America's maritime sector.

American workers throughout the shipbuilding and maritime supply chains were cautiously optimistic, hopeful that the "decades of government neglect" identified by the administration as having weakened our nation's shipbuilding capacity were finally coming to an end. Yet, after months of strong rhetoric about the need for a comprehensive approach to rebuilding American maritime strength, workers, shipyards, and our broader economic and national security interests are once again being sidelined in favor of short-term considerations. The one-year pause is trading away the prospect of revitalizing America's maritime capabilities to restore market access for other sectors. We should not pit one sector against another, but should stand up for American interests overall.

A broad, **bipartisan** coalition of lawmakers, joined by shipbuilders, workers, and industry across the maritime and industrial base has, for decades, consistently sounded the alarm regarding China. Since USTR's investigation and announcement of responsive actions, there have been welcome signs of early momentum in U.S. shipbuilding investment and workforce development — while order books at China's shipyards declined at a more significant rate than during the COVID-19 pandemic. The administration was signaling to the world that the United States understood the importance of being a maritime nation and the scale of the challenge facing our industrial base.

Now, following this retreat, workers who know all too well the boom-and-bust nature of American shipbuilding are again being pushed aside, even as new commercial orders — worth billions of dollars — flow back into Chinese shipyards. Following the announced delay of port fees and related measures, reports indicate that multinational shipping companies are already finalizing significant new contracts with Chinese yards.[1]

By suspending 301 remedies for one year, the U.S. government is introducing uncertainty at the very moment when confidence and long-term planning are most essential. Shipyards, suppliers, investors, and apprentices cannot operate under indefinite delays and shifting expectations. The responsive actions tied to the Section 301 investigation are not merely symbolic. Disincentivizing the purchase and operation of vessels built by the People's Republic of China (PRC) is a necessary foundation for rebuilding American maritime capacity. This delay materially weakens that foundation. China continues to account for over half of global commercial shipbuilding. Last year alone, Chinese shipyards secured roughly 74 percent of all new-build orders. Without sustained and timely action, China's dominance — across the commercial and naval supply chains — will remain entrenched, systemic, and overwhelming.

In addition, the suspension of fees for one year could mean a delay in providing fiscal relief and incentives to America's shipyards and workforce. The creation and implementation of a Maritime Security Trust Fund, as supported by the President's Executive Order on Restoring Maritime Dominance, and as outlined in the bipartisan SHIPS for America Act, may have significantly less funding available to reignite this vital sector.

The surge of interest in revitalizing our nation's maritime capabilities, fueled by our filing of the Section 301 case has been significant. Domestic and foreign interest in investing in the sector has not only created real opportunities, but identified a path to restoring capacity across the maritime sector – from the supply chains to the shipyards to the ports and on the vessels. Cooperation with our allies is a welcome approach, but it must be built on a foundation of American workers and suppliers. We should not continue to outsource and offshore America's maritime power and capabilities.

On behalf of the workers ready, willing, and able to rebuild a strong American maritime sector, we respectfully urge USTR to reaffirm and maintain the responsive

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[1] iMarine, "Maersk Orders Up to 12 LNG-Powered Mega-Ships from China's New Times Shipbuilding", November 5, 2025.

actions announced in connection with the Section 301 investigation. We further encourage USTR to reengage directly with shipyards, labor unions, suppliers, and workforce programs to maintain momentum and confront China's ongoing market distortions. Coupled with other administration actions and the passage of legislation in Congress, we can rebuild the sector.

The United States cannot afford to retreat again. The window for restoring American maritime capacity is real — but it is narrowing. Now is the time to act.

Sincerely,

The United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (USW)

International Association of Machinists (IAM Union)

International Brotherhood of Electrical Workers (IBEW)

International Brotherhood of Boilermakers (IBB)