

7 November 2025

The Honorable Jamieson Greer
United States Trade Representative
Office of the United States Trade Representative
600 17th Street NW
Washington, DC 20508
USA

Dear Ambassador Greer,

**RE: NOTICE OF REQUEST FOR COMMENTS ON SUSPENDING SECTION 301
ACTION FOR ONE YEAR: CHINA'S TARGETING OF THE MARITIME,
LOGISTICS, AND SHIPBUILDING SECTORS FOR DOMINANCE. DOCKET ID:
USTR-2025-0274**

I am writing on behalf of the International Chamber of Shipping (ICS), the principal global trade association representing shipowners and operators, which enjoys good relations with MARAD, the State Department, the Federal Maritime Commission and the United States Coast Guard.

ICS membership comprises national shipowners' associations in the Americas, Asia, Africa and Europe, in more than 40 countries including the Chamber of Shipping of America which represents U.S. shipowners and operators. Around 90% of global trade is transported by sea, and ICS represents over 80% of the world merchant fleet. Our member national associations' members comprise shipping companies from all sectors and trades, including dry bulk carriers (transporting iron ore, coal and grain), oil tankers, chemical tankers, gas carriers, containerships, roll-on roll-off vessels, general cargo ships, offshore service vessels, and passenger ships; all vessel types which service U.S. international trade, carrying approximately 59% of total U.S. imports/exports by value (\$2.2 trillion; \$746 billion of exports and \$1.4 trillion imports)¹ including vital components, raw materials and minerals needed for the manufacture of U.S. goods for domestic and export markets.

ICS welcomes the recent proposal to suspend the responsive actions from the Section 301 investigation for one year, pursuant to the agreement between President

¹ *International Freight Gateway*, Bureau of Transportation Statistics, U.S. Department of Transport, available at: <https://data.bts.gov/stories/s/International-Freight-Gateways/4s7k-yxvu/>

Trump and President Xi Jinping of China. This is a positive development for U.S. exporters, industries and consumers, and global trade.

As reiterated in ICS's previous submissions to the USTR on this matter, ICS supports the ambition to increase U.S. shipbuilding capacity and to make the United States Shipbuilding industry strong, as additional commercial tonnage strengthens the global maritime sector's efficiency and competitiveness. However, the port fees imposed by USTR on 14 October 2025, and subsequently by China as countermeasures on U.S.-linked ships, posed significant challenges and disruptions for the U.S. economy and consumers, the global shipping industry and global trade.

ICS hopes that the agreed suspension will, in due course, pursuant to negotiations, evolve into a permanent agreement between the U.S. and China. ICS strongly advocates for the need for shipping to be able to move trade freely and efficiently and remain committed to working collaboratively with all administrations and international partners to avoid any disruptions to the flow of global trade.

ICS has encouraged the government of China to engage in the OECD's Council Working Party on Shipbuilding (WP6), which aims to assist governments in reducing market-distorting factors in shipbuilding, primarily subsidies and excess capacity, to promote normal competitive conditions. We encourage the U.S. government to also engage in these discussions to constructively address and resolve issues related to market-distorting measures within the global shipbuilding market.

ICS remains committed to working with USTR and the White House Shipbuilding Office to help ensure that practicable policies are developed and implemented, which can deliver on the President's ambitious vision for U.S. shipbuilding, without harming U.S. industries and consumers.

We remain at your disposal for further clarification of the above.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Thomas A. Kazakos', written over a horizontal line.

Thomas A. Kazakos

Secretary General

International Chamber of Shipping