

**Comments on Suspending Section 301 Action for One Year:
China's Targeting of the Maritime, Logistics, and Shipbuilding Sectors for Dominance**

November 7, 2025

The undersigned organizations representing the interests of the U.S. cotton industry support the suspension of the actions that resulted from USTR's Section 301 investigation of China's dominance within the maritime, logistics, and shipbuilding sectors.

The U.S. cotton industry is heavily dependent on international trade as 99 percent of U.S. cotton production enters the global marketplace in the form of raw fiber, yarn or fabric. U.S. cotton faces an increasingly competitive global market due in part to the surge in Brazil's cotton production. The economic health of the industry is directly impacted by the ability to be competitive in world trade. During USTR's Section 301 investigation of the maritime and shipbuilding sectors, the industry appreciated the opportunity to convey our concerns about the impact of the vessel fees and other charges that would directly affect the costs and competitiveness of U.S. cotton.

During the upcoming suspension, we strongly support USTR's continued engagement with China to seek outcomes that adequately support efforts to revitalize American shipbuilding, while not harming the competitiveness of U.S. agricultural exports. Reinstating vessel fees would compound costs and risks, eroding U.S. cotton's competitiveness in key international markets. The suspension provides necessary relief and stability for agricultural exporters and should be maintained.

We further oppose any new or expanded fees on containerized cargo, ship-to-shore cranes, chassis, or related port equipment under this investigation. Such fees would increase costs across the export chain, including inland logistics and container availability, disproportionately impacting U.S. agricultural shipments that rely on predictable, low-margin freight economics. In the context of the extreme challenges being faced by stakeholders in U.S. agriculture, this is of critical importance.

Thank you for the opportunity to provide these comments on this critically important issue.

America's Cotton Marketing Cooperatives
American Cotton Shippers Association
National Cotton Council