



# VIRGINIA MARITIME

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## A S S O C I A T I O N

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

March 23, 2025

Re: Docket ID: USTR-2025-0002; Request for Comments Concerning Proposed Action Pursuant to the Section 301 Investigation of China's Targeting of the Maritime, Logistics, and Shipbuilding Sectors for Dominance

Dear Ambassador Greer,

The Virginia Maritime Association (VMA) is the 105-year-old trade association representing over 450 businesses engaged in the flow of waterborne commerce through Virginia's ports to include vessel operators, marine terminal & warehouse operators, shipbuilding & repair yards, importers, exporters, and all manner of companies involved in freight transportation and logistics. The vast majority being U.S. businesses.

Virginia is home to the second-largest commercial port on the U.S. East Coast by tonnage and third largest by container volume. A recent analysis of the economic impacts of Virginia's maritime industry demonstrates over \$1.3 billion in cargo flows through our ports, and 20% of Virginia's employment and 14% of gross state product (GSP) results from these commercial maritime activities.

This economic engine underpinning Virginia's economy is possible because commercial ships make over 2,400 calls each year across a multitude of marine terminals capable of handling a diverse mix of vessels and cargoes, including containers, dry and liquid bulk products, breakbulk, rolling stock, and specialized cargoes.

Therefore, when Virginia's volume of ship traffic and economic reliance on the maritime industry are considered, the membership of the VMA and the citizens of the commonwealth have a substantial stake in the proposed actions to counter China's efforts to dominate the maritime, logistics, and shipbuilding sectors.

VMA applauds the Trump Administration's desire to revitalize the American shipbuilding and broader maritime industries. However, it is not evident the administration's aims to revitalize the shipbuilding and maritime strength of the U.S. will be achieved by the proposed fees and restrictions.

On the other hand, our membership has raised significant concerns that these measures will negatively impact their businesses and the economy. Concerns heard from our membership include:

- The fees proposed are substantial and vessel operators will pass those costs on to the owners of the cargo. Single cargo shippers using bulk carriers will incur the full amount of the fee against a vessel. Virginia is the largest coal export port in the nation and agriculture is Virginia's largest single industry. Both sectors utilize bulk carriers and are highly sensitive to transportation costs to remain competitive in the global market.



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- There is limited availability of non-Chinese vessels. Higher charter costs and longer wait times to secure non-Chinese vessels are anticipated. The resulting increased transportation costs will have an inflationary effect, and the limited availability of ships will be disruptive to supply chains.
- Ocean carriers are expected to reduce the number of calls their vessels will make at U.S. ports, concentrating their services to call on the largest ports. Industry experts predict reduced sailings will lead to port and marine terminal congestion, equipment shortages, freight bottlenecks, delays and disruptions in supply chains. Operating inefficiencies, increased transportation and production costs, and reductions in market access will be incurred by U.S. manufacturers, importers, and exporters.

All involved in the production, storage, and transportation of cargo carried by ship will be touched by these proposed actions. In addition to the ocean carriers this includes manufacturers, importers, exporters, warehousing companies, logistics providers, railroads, trucking companies, marine terminals, waterfront labor, tug companies, marine fuel providers, and many more. Their businesses and the livelihoods of their employees will be affected.

More broadly, these stated concerns have ramifications for vital U.S. supply chains and the common thread of increasing costs that will be passed on to consumers.

The VMA supports the administrations goals to revitalize the U.S. shipbuilding and broader maritime sector. However, those goals will take years to achieve, and it is unclear whether the proposed fees and restrictions will be effective tools to meet those objectives. Whereas the harmful impacts of the proposed fees and restrictions will be immediately felt by U.S. businesses and citizens.

The VMA appreciates the opportunity to comment on the matter. We encourage you to take advantage of the abundance of industry expertise available and eager to work with you to develop a more comprehensive and long-term strategy that will put our nation on a successful path to revitalize and reassert U.S. strength in the maritime, logistics, and shipbuilding sectors.

Sincerely,



David White  
Executive Director

Submitted Electronically via USTR portal: <https://comments.ustr.gov/s/>