



MARITIME EXCHANGE

for the Delaware River and Bay

Leading the Way to Port Progress

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June 28, 2024

Juan Millán, Esq.
Acting General Counsel
Office of the U.S. Trade Representative
600 17th Street N.W.
Washington, DC 20508

RE: Docket Number USTR-2024-0007
Request for Comments – Section 301 China Tariff Modifications

Dear Mr. Millán:

As a nonprofit association representing thousands of individuals working within the Delaware River port complex whose livelihoods depend on robust global commerce and as a member of Americans for Free Trade (AFT), the Maritime Exchange for the Delaware River and Bay appreciates the opportunity to provide comment to the above-referenced docket.

Our members are extremely concerned about the proposed modifications to the ongoing Section 301 China tariff actions. These tariffs have by no means achieved their goals of penalizing China for unfair trade practices—as the USTR noted in its four-year report—or compelling U.S. companies to source their goods elsewhere. On the contrary, all the tariffs have accomplished is to increase costs for U.S. businesses and consumers and to decrease trade in certain goods.

Thus, modifying the tariffs will not only not help the U.S. achieve its China trade policy goals, it will only exacerbate an already harmful trade environment for U.S. interests. Proposing that doing more of the same will yield different results is fiscally imprudent and irresponsible.

That the U.S. needs a clear and effective trade strategy to address China's underlying unfair trade practices has become apparent. Future efforts cannot rely solely on tariffs, as this strategy has already been seen to fail. Instead, we strongly encourage the administration accept and implement the AFT recommendations for a new approach. These include: realigning the Section 301 tariffs; creating a new exclusion process; using targeted tools to hold bad actors accountable; supporting U.S. supply chain resiliency and competitiveness by partnering with allies; and supporting supply chain diversification efforts. Additional detail is available in the AFT's letter to this docket, which we wholeheartedly endorse.

We strongly urge USTR and the administration to reevaluate the proposed modifications to the Section 301 China tariffs, including the decision to maintain current tariffs on non-strategic goods like consumer products. Thank you for the opportunity to provide these comments.

Sincerely,

Lisa B. Himber
President