



4 June 2024

Ambassador Tai
Office of the US Trade Representative
600 17th Street NW
Washington, DC 20508

**Comments on the Section 301 Investigation
of China's Acts, Policies and Practices Targeting
the Maritime, Logistics and Shipbuilding Sectors for Dominance**

Docket ID: USTR-2024-0005

Dear Ambassador Tai,

We are writing on behalf of the Shipping Federation of Canada, which is Canada's national voice of the owners, operators and agents of ocean-going ships that carry Canada's international trade between Canadian ports and markets throughout the world. Our seventy member companies represent over 200 shipping lines, whose vessels carry imports and exports, ranging from dry bulk commodities such as grain, coal and iron ore – to liquid bulks such as crude oil, oil products and renewables – to containerized consumer and manufactured goods. All our members' ships are foreign-flagged and international shipping carries the vast majority of Canada's overseas trade.

We are writing to provide comments regarding the Section 301 petition that was filed on 12 March 2024 by five US labour unions requesting that remedial action be taken against the acts, policies and practices of China within the maritime, logistics and shipbuilding sector. We are concerned with the remedial action proposed by the petition, particularly as relates to the proposed imposition of a port fee on Chinese-built vessels calling US ports. Given the global nature of the shipping industry, and of the international impact that trade restrictive measures may have on the efficiency of global maritime transport, the Shipping Federation strongly supports the position paper submitted by the International Chamber of Shipping (ICS), the global trade association representing shipowners and operators comprising over 80% of the world's merchant fleet.

In particular, we wish to underscore the closing statements of the ICS paper, which notes that upholding the principles of free and fair trade is essential for the efficiency of global maritime transport. With international shipping responsible for the carriage of around 90% of world trade, the preservation and promotion of free trade policies and principles must be upheld globally to support a level playing field that is underpinned by principles of open and free market access and removal of restrictive trade barriers.

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SHIPPING FEDERATION OF CANADA

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Given the foregoing, any remedial measures should be raised through the World Trade Organization to ensure a level playing field for all.

We trust that our comments will be given due consideration and respectfully request that you keep us apprised of developments as they arise.

Yours truly,

A handwritten signature in black ink, appearing to read 'CHH', is positioned above the typed name.

Chris Hall
President and CEO
Shipping Federation of Canada