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Kevin Dempsey
President and Chief Executive Officer

November 7, 2025

SUBMITTED VIA COMMENTS.USTR.GOV/S

The Honorable Jamieson Greer
United States Trade Representative (USTR)
600 17th St., NW
Washington, DC 20508

**Re: Request for Comments on Suspending Section 301 Action for One Year:
China's Targeting of the Maritime, Logistics, and Shipbuilding Sectors for
Dominance (USTR-2025-0274)**

Dear Ambassador Greer:

The American Iron and Steel Institute (AISI) submits the following comments to the United States Trade Representative (USTR) regarding the Request for Comments on Suspending Section 301 Action for One Year: China's Targeting of the Maritime, Logistics, and Shipbuilding Sectors for Dominance (USTR-2025-0274).¹

AISI serves as the voice of the American steel industry in the public policy arena and advances the case for steel in the marketplace as the preferred material of choice. AISI's membership is comprised of integrated and electric arc furnace (EAF) steelmakers, steel pipe and tube manufacturers and steel processors and fabricators, reflecting the production and distribution of carbon, electrical and stainless steels. These steels are critical to America's national and economic security, including roads and bridges, buildings, the electrical grid, defense applications, cars and trucks and all clean energy technologies. AISI also represents associate member companies who are suppliers to or customers of the steel industry.

AISI appreciates the Trump administration's focus on the American commercial shipbuilding and maritime sector, which plays an essential role in our defense industrial base, and as such, our national and economic security. The American steel industry is one of the primary suppliers of critical raw materials to America's

¹ "Request for Comments on Suspending Section 301 Action for One Year: China's Targeting of the Maritime, Logistics, and Shipbuilding Sectors for Dominance." Federal Register. Trade Representative, Office of the United States. November 6, 2025. Available at: <https://ustr.gov/sites/default/files/files/Press/Releases/2025/301%20Ships%20FRN%20Req%20Cmts%20on%20Suspension%20FINAL.pdf>.

shipbuilding industry. Steel, especially steel plate, is a critical and irreplaceable material used for construction of commercial and military ships.

As USTR is well aware, many of the challenges the American steel industry faces are due to predatory actions undertaken by China in recent decades. The Chinese policy of state capitalism is antithetical to the principles of free and fair trade, which has fueled China's massive growth in excess steel capacity. For example, from 2000 through 2024, annual Chinese raw steel production increased by roughly 880 million metric tons (MT) – a volume over 10 times greater than the total crude steel production in the United States in 2024. China's increased production has been made possible, in large part, by massive government subsidies. The U.S. Department of Commerce (DOC) has specifically identified numerous subsidies benefiting Chinese steel producers.

Just like in steel, USTR's investigation and findings in its January 2025 report on China's Targeting of the Maritime, Logistics, and Shipbuilding Sectors for Dominance explains how China's acts, policies, and practices have crowded out global competition in commercial shipbuilding by providing its shipbuilders state support, subsidies, below market supply chains in key materials, like steel, predatory pricing, among many other unfair trade practices.² Accordingly, AISI urges USTR to continue to work to implement responsive actions to deter the purchase and utilization of Chinese-built and operated ships and the acquisition of Chinese-built equipment and inputs used in U.S. port infrastructure and cargo handling during the suspension period. AISI also urges the administration to continue actions to hold China accountable for its trade-distorting policies and practices by taking actions to counter China's export-driven economic policies that adversely impact U.S. shipbuilders and steelmakers.

Reviving U.S. shipbuilding capabilities has the potential to create tens of thousands of jobs at U.S. shipyards and within the entire shipbuilding supply chain at manufacturing operations that produce key inputs across the Country. The U.S. has significant steel plate production, including specialty plate for shipbuilding applications, which is currently substantially underutilized. In fact, the U.S. International Trade Commission, in a recent trade remedy proceeding, found that capacity utilization in the cut-to-length (CTL) plate sector was an average of 67.8% over the period examined. Since that case, domestic CTL plate capacity has only increased, with additional new capacity coming online. U.S. steel producers are fully prepared to meet the steel needs of shipbuilders as they increase their build rates and encourages the Administration to continue its work to revive the American maritime and shipbuilding sectors.

² "Section 301 Investigation – Report on China's Targeting the Maritime, Logistics, and Shipbuilding Sectors for Dominance." Federal Register. Trade Representative, Office of the United States. January 14, 2025. Available at: <https://ustr.gov/sites/default/files/enforcement/301Investigations/USTRReportChinaTargetingMaritime.pdf>.

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AISI is a strong supporter of Congressional efforts to revitalize domestic shipbuilding as well and recommends that during the suspension period, USTR work closely with Congress on enactment of strong polices that will aid in the restoration of the nation's shipbuilding capabilities. In particular, AISI has endorsed S. 1541, the Shipbuilding and Harbor Infrastructure for Prosperity and Security (SHIPS) for America Act of 2025 introduced by Senators Mark Kelly and Todd Young. Representatives John Garamendi and Trent Kelly have taken the lead to advance the SHIPS for America Act in the U.S. House of Representatives. This bipartisan legislation would enable a comprehensive approach to revitalize the United States shipbuilding and commercial maritime industries and complements the efforts of the Administration.

AISI and our member companies look forward to continuing to work with the Trump administration and Congress to create and implement policies that will increase the demand for domestic steel products that are essential for a revitalized American-made shipbuilding industry. Finally, AISI urges the Administration to quickly resume Section 301 actions, should China fail to live up to its obligations under the deal recently secured by President Trump.

Sincerely,

A handwritten signature in black ink that reads "Kevin M. Dempsey". The signature is written in a cursive, slightly slanted style.

Kevin M. Dempsey
President and Chief Executive Officer