October 30, 2026

Ambassador Jamieson Greer
United States Trade Representative
Office of the United States Trade Representative
600 17th Street NW
Washington, D.C. 20508

Submitted electronically via USTR portal

Re: Docket ID USTR-2026-0690 – Request for Comments on the Further Suspension of Section 301 Action: China's Targeting of the Maritime, Logistics, and Shipbuilding Sectors for Dominance

Dear Ambassador Greer:

The American Soybean Association, U.S. Soybean Export Council, Soy Transportation Coalition, and U.S. Identity Preserved Alliance appreciate the opportunity to comment on the United States Trade Representative (USTR) proposal to further suspend responsive actions pursuant to the Section 301 Investigation of China's Targeting of Maritime, Logistics, and Shipbuilding Sectors for Dominance. As USTR continues to pursue a more beneficial trade deal for U.S. soy, we appreciate two-month extension of the U.S.-China trade truce following the summit between Presidents Trump and Xi. The U.S. soybean industry strongly supports the USTR proposal to extend the suspension of Section 301 port fees on Chinese-built and Chinese-linked vessels until January 9, 2027, while bilateral negotiations continue.

The American Soybean Association (ASA) represents approximately 500,000 U.S. soybean farmers on domestic and international policy issues important to the soybean industry and has 26 affiliated state associations representing 30 primary soybean-producing states. Soybeans are a top U.S. agricultural export, with half of our crop destined for overseas markets, and U.S. soybean growers have long been committed to producing the world's food, feed and fuel.

The U.S. Soybean Export Council (USSEC) represents the interests of U.S. soybean producers, commodity shippers, merchandisers, allied agri-businesses, and other agricultural organizations in international markets. USSEC focuses on differentiating, elevating preference, and attaining market access for the use of U.S. soy for human consumption, aquaculture, and livestock feed in more than 90 countries internationally. USSEC's mission is to maximize the utilization, value, and access to markets of U.S. Soy around the world by meeting the needs of our stakeholders and global customers.

Established in 2007, the Soy Transportation Coalition (STC) is comprised of fourteen state soybean boards, ASA, and the United Soybean Board. The goal of the organization is to position the soybean industry to benefit from a transportation system that delivers cost effective, reliable, and competitive service.

The U.S. Identity Preserved Alliance (USIP Alliance) is the business alliance of identity preserved agriculture in the United States. USIP Alliance is the leading voice for the industry that delivers traceable, high-quality, variety-specific field crops to food markets worldwide. Its members include producers, processors, suppliers and transportation allies whose work ensures integrity throughout the supply chain. Its mission is to build, grow and sustain a reliable supply chain that ensures integrity of the end product, with a commitment to quality, stewardship and innovation. USIP Alliance's vision is to promote and enhance value throughout the supply chain, from farmer to food business.

From the field to the final customer, all stages of the soybean value chain work together to ensure farmers have continued access to global export markets. While the U.S. soybean industry strongly supports domestic investments in the infrastructure that moves our crop to the market, we remain concerned that resuming or imposing new port fees under this Section 301 responsive action will result in significant negative impacts across U.S. agriculture and add additional market barriers to an industry already constrained by low commodity prices, elevated transportation costs, high input prices, and trade disruptions.

Support for a long-term suspension of port fees

The U.S. agriculture industry can only remain competitive in export markets through the efficiency and cost-effectiveness of the infrastructure that moves our product to market. While the proposed further suspension of Section 301 port fees addresses immediate shipping disruption concerns, the short-term delay until January 9, 2027, remains a significant threat to the U.S. soy industry during our primary export shipping window. To reduce the risk of export delays or shipping disruptions, the U.S. soybean industry encourages USTR to consider a long-term extension of the Section 301 port fee suspension to provide much-needed certainty to farmers, shippers, and export customers.

The U.S. soybean value chain has long demonstrated a commitment to supporting improvements in U.S. infrastructure and transportation – the foundation on which U.S. soybeans move from the field to the final customer. While we applaud the initiative of this administration to address issues posed by China in the global maritime trade and bolster domestic shipbuilding, we request that USTR consider a further delay of the Section 301 port fees while working with industry to determine achievable remedies that will not undermine the ability of U.S. soy to compete in the global export marketplace.

U.S. soybean industry impacts

Soy products are a top U.S. agricultural export, with most moving on ocean-going vessels. Most exported U.S. soybeans and soybean meal move via dry bulk carrier, but a significant

volume of high-value premium food-grade and identity preserved soy moves via container ship. Unfortunately, U.S. soybeans and all other exported agriculture products are reliant on a global shipping fleet that is comprised of nearly 50% Chinese-built vessels. Reduction in supply of Chinese vessels increases overall freight costs. Once incorporated into company cargo rates, the Section 301 port fees will raise import costs while reduced shipping capacity will raise export costs. Overall freight costs may also be impacted by reduced routes, less frequent U.S. port calls, or other measures that diminish export volume through restricted or limited capacity.

U.S. soybeans remain competitive in global markets compared to South American competitors in part because of the low costs associated with our efficient transportation systems. One of the major determining factors for U.S. soybean prices is the landed price of goods in destination markets. The landed price includes the cost of goods (such as soybeans), insurance, and freight or transportation costs. Ultimately, levying Section 301 port fees will increase overall export transportation costs.

We appreciate USTR for its previous revisions to the original Section 301 remedies that acknowledged limitations in U.S. maritime industry scalability and made targeted improvements to address the concerns of agricultural exporters. However, the port fees will still be borne by farmers, with bulk agricultural shipment remaining the most exposed based on updated fee structures.

Conclusion

The U.S. soy industry is reliant on efficient and resilient global maritime transportation to move our product to market. Bulk agricultural shipment sustains most export markets for U.S. soy, while containerized shipping diversifies our market opportunities. Our industry strongly supports the USTR proposal to suspend responsive action related to the Section 301 port fees for another two months.

While we look forward to a future where the U.S. is a major player in the maritime community, we request that USTR consider a long-term suspension to the Section 301 port fees while identifying other remedies that do not undermine the U.S. soybean industry's ability to compete in global markets, especially during our peak harvest export window.

ASA, USSEC, STC, and USIP Alliance appreciate the continued work of USTR to grow export market opportunities for U.S. soy. We look forward to our continued engagement on behalf of the U.S. soy industry.

Sincerely,

American Soybean Association
U.S. Soybean Export Council
Soy Transportation Coalition
U.S. Identity Preserved Alliance