November 12, 2025

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

Re: Docket No. USTR-2025-0017 – Notice of Modification and Proposed Modification of Section 301 Action on China's Targeting of the Maritime, Logistics and Shipbuilding Sectors

Dear Ambassador Greer:

The National Stone, Sand & Gravel Association (NSSGA) and the National Asphalt Pavement Association (NAPA) appreciate the opportunity to comment on the United States Trade Representative's proposed modifications to the Section 301 action announced on October 10, 2025. These comments follow our joint submission on March 24, 2025, which expressed concern about imposing fees on Chinese-built vessels, and the NSSGA comments submitted on November 7 regarding the underlying suspension of the Section 301 action. The new proposal would remove Targeted Coverage Article VII, effectively eliminating the exemption for laker vessels serving the Great Lakes. This change would have direct and negative consequences for the aggregates and asphalt sectors.

NSSGA members include stone, sand, and gravel producers; industrial sand suppliers; along with equipment manufacturers and service providers who support them. With over 9,000 locations, the aggregates industry produces about 2.5 billion tons of materials each year in the United States. Aggregates are the building blocks of modern society and are vital for constructing and maintaining heavy infrastructure such as roads, railways, bridges, tunnels, data centers, warehouses, residential buildings, water supply systems, sewers, electrical grids, and telecommunications networks.

NAPA is the lone national trade association representing asphalt producers, pavers, and contractors, with over 1,100 member companies and 350,000 workers across the country. The asphalt industry produces approximately 400 million tons annually for the national surface transportation system from more than 4,000 asphalt plants nationwide. Asphalt pavements make up over 94% of the roadway market and more than 80% of the airfield market. Our mixes depend on two main raw material inputs: aggregates and asphalt binder.

Laker vessels are essential to the U.S. import and export of construction materials in the Great Lakes region. The proposed fees threaten to render established trade patterns unsustainable, resulting in significant cost increases for American companies. The Laker fleet supports long-term planning, capital investment, and operational certainty, all of which are essential for delivering infrastructure across the northern United States. In some cases, these increases may force the suspension of vital trade routes, leaving U.S. businesses without viable alternatives.

Laker vessels serve a uniquely regional purpose and do not participate in global shipping markets. They operate solely within the Great Lakes and St. Lawrence Seaway, supporting commerce in states such as Minnesota, Michigan, Wisconsin, Illinois, Indiana, Ohio, New York and Pennsylvania. Unlike ocean-going ships, Lakers cannot redeploy to other international trade routes or serve different markets. Their function is geographically limited, and their capacity is essential for efficiently moving bulk cargo. Efforts to change the current Targeted Coverages would create uncertainty, disrupt established logistics routines, and increase freight costs.

The cost of shipping construction materials is already a significant factor in determining where infrastructure can be built, and even small price increases can substantially impact the viability of projects in inland communities. The Laker exemption helps prevent these unintended effects and maintains a highly efficient, specialized regional transportation system.

While addressing unfair trade practices by China is essential for rebuilding American shipbuilding capacity, the proposed change could go too far and harm beneficial regional trade patterns and supply chains. The Great Lakes fleet is a key part of cross-border commerce, and penalizing these ships would disrupt domestic supply chains and unfairly burden U.S. businesses and consumers.

For example, the Northeast and Great Lakes region imports aggregates from Canada. Laker vessels carry about 5–6 million tons of Canadian limestone annually to U.S. ports on Lakes Superior, Huron, and Erie. For example, New York, Michigan, Ohio and others receive shipments from huge quarries in Ontario. In 2023, Canadian Great Lakes quarries shipped 5.5 million tons of stone to the U.S., supplementing domestic production. Upstate New York and New England also import specialty aggregates, such as high-quality trap rock or granite, from Eastern Canada. Thus, while the Great Lakes region can source locally for many projects, certain large-scale jobs, including bridges and road base, have leveraged Canadian imports.

Additionally, asphalt binder is not readily available in upper Midwestern states, like Wisconsin, where refining capacity is limited. Thus, asphalt producers across the region rely on laker vessels throughout the Great Lakes to ensure imported asphalt binder is readily available. In fact, over 90% of the usable asphalt binder needed for asphalt pavement design and deployment on Wisconsin's roads is transported across the Great Lakes. Disrupting Laker vessel traffic would have an adverse effect on local road construction costs and project delays.

We respectfully urge the USTR to reconsider the proposed modification and maintain the fair and balanced approach outlined in the April 2025 Notice of Action. Specifically, if the USTR feels it must act, we encourage removing Article VII as proposed, but without adding any replacement text. This would ensure laker vessels are on an equal footing with other ship categories, and they would need to meet the other Targeted Coverage criteria to qualify for fee exemptions.

The USTR's initial approach clearly communicated to China while protecting vital trade routes. The proposed changes released on October 10 pose a risk of causing unintended harm to U.S. interests and regional prosperity. We encourage you to consider these concerns during the ongoing consultation process.

Thank you for your attention to this matter.

Sincerely,

The National Asphalt Pavement Association
The National Stone, Sand & Gravel Association