



THE NATIONAL ASSOCIATION OF WATERFRONT EMPLOYERS

May 18, 2026

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

Dear Ambassador Jamieson Greer:

Thank you for your leadership in the Administration's efforts to combat China's maritime dominance. NAWE has testified twice before the USTR on the 301 investigations on China's Targeting of the Maritime, Logistics, and Shipbuilding Sectors for Dominance and has consistently provided useful and actionable comments and recommendations in response to the USTR's proposals on the maritime industry investigation. We are writing to share several implementation considerations and questions that NAWE members are actively evaluating in connection with the one-year pause on Chinese imports of ship-to-shore (STS) cranes and other designated large yard cargo handling equipment (LYCHE), and to encourage continued dialogue between USTR and marine terminal operators (MTOs) regarding these issues.

NAWE is a non-profit trade association whose member companies are privately-owned stevedores, MTOs, and other U.S. waterfront employers. NAWE's member companies engage in business at major U.S. ports on the Atlantic and Pacific coasts, the Gulf of America, the Great Lakes, and Puerto Rico. Accordingly, NAWE's members operate the critical connection between global commerce and our nation's economy and are committed to keeping America's international trade and commerce flowing, while maintaining an unwavering dedication to workplace safety for our waterfront workers.

National Association of Waterfront Employers
660 Pennsylvania Ave SE, Suite 301A
Washington, DC 20003

With more than 60 members, NAWE's membership handles over 90 percent of the nation's containerized trade, a substantial portion of the nation's breakbulk trade, and a majority of the nation's cruise ship passengers. NAWE members are in the business of running our nation's ports, handling our supply chain, and will be a major building block in President Trump's efforts towards the revitalization of the U.S. maritime industrial base. NAWE and its members share the Administration's goal of strengthening the domestic maritime industrial base and reducing long-term supply chain dependence on China.

The NAWE board members are responsible for purchasing nearly the entire U.S. capacity for STS cranes and LYCHE. Because the NAWE members have been and are currently so dependent on this market to facilitate the movement of the nation's supply chain, our members are actively evaluating how best to complete current orders and transition to other cost-effective sourcing options consistent with the Administration's objectives. As part of that process, our members have identified several initial questions and implementation considerations that would benefit from further discussion and clarification with USTR and other relevant agencies.

Examples of the questions our members are evaluating include:

- What is the applicable tariff percentage for STS cranes imported from China prior to the one-year pause?
- What is the applicable tariff percentage for STS crane parts imported from China prior to the one-year pause?
- How does the one-year pause on tariffs affect STS cranes and STS crane parts from China?
- Does the tariff exemption apply to STS cranes and parts ordered during the one-year pause period, or does the tariff exemption apply to STS cranes and parts delivered during the one-year pause period?
- What event would trigger the application of the tariff?
- What is the current status and projected timeline for domestic STS crane manufacturing capacity sufficient to meet U.S. port demand, and how does the Administration envision supporting the transition period between current domestic manufacturing capacity and the immediate capital requirements of U.S. terminals?


While the industry realizes this is a fluid and ongoing investigation, MTOs are significantly challenged in assessing viable options for investment in STS/LYCHE that reduce dependence on Chinese manufacturers. Given the scale of anticipated terminal investment needs and ongoing market uncertainty, NAWE has recently surveyed our board members on their capital expenditure plans for the next five years.

Just for the largest pieces of cargo handling equipment, we can report that U.S. terminals have identified a need to invest over \$6 billion to continue to keep our nation's port terminal complexes operating safely and with maximum efficiency. When also factoring in smaller pieces of equipment and civil development, the total investment will be a multiple of that figure.

Having clarity on what, and when, tariffs will be applied can make the difference between whether a purchase is executed or delayed, which could cost the U.S. economy jobs, efficiency and millions in economic activity.

NAWE and its members welcome the opportunity to provide additional operational background and engage in further discussions with USTR regarding these implementation questions and the practical challenges associated with transitioning away from dependence on Chinese-manufactured STS cranes and related equipment. Greater clarity regarding timing, applicability, and market transition considerations will assist terminal operators in making informed investment decisions that support both supply chain continuity and the Administration's broader maritime objectives.

Sincerely,

A handwritten signature in black ink, appearing to read "Carl W. Bentzel". The signature is stylized and written in a cursive script.

Carl Bentzel President
National Association of Waterfront Employers

Cc: The Honorable Howard W. Lutnick United States Secretary of Commerce
The Honorable Marco Rubio, White House National Security Advisor/Secretary of State
The Honorable Stephen Carmel, United States Maritime Administrator