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May 21, 2018

Ambassador Robert Lighthizer
United States Trade Representative
Office of the United States Trade Representative
600 17th Street, NW
Washington, DC 20508

RE: Docket No. USTR-2018-0005; Request for Public Comment Concerning Proposed Determination of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation

Dear Ambassador Lighthizer,

On behalf of the Mississippi Commercial Fisheries United, we respectfully submit the following public comments in support of the request made through the April 17, 2018 letter from Senator John Kennedy (LA) to President Donald J. Trump that recommends all Chinese crawfish and shrimp products be included as part of the merchandise subject to increased tariffs in any action taken under 19 U.S.C. § 2411 (Section 301). Additionally, the Mississippi Commercial Fisheries United contends that the Administration should include all imports of merchandise produced through Chinese aquaculture or transshipped through China in any Section 301 action.

The Mississippi Commercial Fisheries United, Inc. ("MSCFU") is a non-profit Corporate business alliance consisting of commercial fishermen, fishing businesses, seafood dealers/ markets, and supporting businesses that are united in our common mission to protect the interests of Mississippi's commercial fishing industry; support sustainable fisheries through leadership in stewardship; and advocate on behalf of our members and consumers of the resources our members provide. Currently, the U.S. shrimp and crawfish industry supports thousands of small and medium-sized family-run enterprises and is a vital contributor to the economies of many local communities, especially here on the Mississippi Gulf Coast. As an organization, MSCFU expresses sincere concerns about unfair trade practices involving imported seafood that has crippled the U.S. wild-caught seafood industry for decades.

In the Federal Register Notice published from the Office of the United States Trade Representative (USTR), the agency explains that the list of products proposed to be covered by any Section 301 action was developed by the identification of "products that benefit from Chinese industrial policies, including Made in China 2025," with refinements made to remove "specific products identified by analysts as likely to cause disruptions to the U.S. economy, and tariff lines that are subject to legal or administrative constraints." The final list set out in the Federal Register Notice was established by first ranking these products "according to the likely impact on U.S. consumers, based on available trade data

involving alternative country sources for each product,” and then “selecting products from the ranked list with lowest consumer impact.”

We note that, in the context of a countervailing duty investigation, the U.S. Department of Commerce has previously made final affirmative determinations that Chinese shrimp producers and exporters received significant government assistance for their operations from the Government of China. Thus, the Chinese shrimp industry has benefitted from Chinese industrial policies. At the same time, because of the widespread adoption of aquaculture production throughout the world, any limitation or encumbrance on imports of merchandise produced through Chinese aquaculture would have a limited adverse impact on American consumers.

More importantly, MSCFU believes that the inclusion of goods produced through Chinese aquaculture in any Section 301 action would benefit American consumers. The indiscriminate and unregulated use of antibiotics in aquaculture poses a significant health and safety risk to American consumers and, because of the spread of anti-microbial resistant pathogens, to the public at large. Most major aquaculture producing countries have undertaken substantial steps to eradicate the use of antibiotics. On the other hand, a small number of countries, including China, have declined to take similar measures and have enjoyed unfair (and deeply unethical) competitive advantages over responsible aquaculture producers.

Again, we urge you to please duly consider and support including Chinese crawfish and shrimp products part of the merchandise subject to increased tariffs in any action taken under 19 U.S.C. § 2411 (Section 301). Our struggling domestic seafood producers deserve fair trade actions and we believe the inclusion of crawfish and shrimp in any action to increase tariffs on these imported products will help to level the playing field for hard-working American businesses. The flood of cheap, adulterated, and antibiotic laced seafood products from China as well as many other countries has severely undermined the American wild-caught seafood industry for far too long. The time is now to take a stand for American producers.

Sincerely,

A handwritten signature in blue ink that reads "Ryan Bradley". The signature is written in a cursive, flowing style.

Ryan Bradley- Executive Director
Mississippi Commercial Fisheries United, Inc.