July 6, 2026

Submitted via comments.ustr.gov

Ambassador Jamieson Greer
United States Trade Representative
Office of the United States Trade Representative
Executive Office of the President
600 17th Street, NW
Washington, DC 20508

Re: Docket Nos. USTR-2026-0265 and USTR-2026-0266: Comments Regarding Proposed Action in the Section 301 Investigations of Acts, Policies, and Practices of Various Economies Related to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced with Forced Labor

Dear Ambassador Greer:

On behalf of the American Shrimp Processors Association (ASPA), the Catfish Farmers of America (CFA), the Crawfish Processors Alliance (CPA), the Crawfish Commodity Committee of the Louisiana Farm Bureau Federation (LFBF), and the Southern Shrimp Alliance (SSA), we respectfully submit to the Section 301 Committee the following comments regarding the United States Trade Representative's (USTR) determinations and proposed actions following the investigations of the acts, policies, and practices of China, Ecuador, India, Indonesia, Mexico, Thailand, and Vietnam relating to the failure to impose and effectively enforce a prohibition on the importation of goods produced with forced labor.[1] These comments are submitted in accordance with the deadline specified in the *Federal Register* notice.[2]

I. Introduction

In April 2026, the American Shrimp Processors Association ("ASPA") and SSA jointly filed comments regarding the acts, policies, and practices of China, Ecuador, India, Indonesia, Thailand, and Vietnam relating to regulating forced labor in their upstream supply chains.[3] As ASPA and SSA observed, beyond the use of forced labor in foreign shrimp supply chains, the importation of inputs – particularly fishmeal – produced through forced labor into countries that export significant quantities of farmed shrimp to the U.S. market has severe adverse impacts on the American shrimp industry: "The absence of effective prohibitions on imports made with forced labor in the countries at issue allows forced-labor-tainted inputs to flow through global

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1 *Notice of Determinations and Request for Comments Concerning Actions in Section 301 Investigations of Acts, Policies, and Practices of Various Economies Related to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced with Forced Labor*, 91 Fed. Reg. 34,272 (USTR June 5, 2026) (Notice of Determinations, request for comments) ("*Request for Comments*").

2 *Id.*

3 *See* https://comments.ustr.gov/s/commentdetails?rid=6R6GJH33YJ.

supply chains and into products exported to the United States."[4] The importation and use of inputs produced through forced labor in these countries distort competition by unfairly reducing production costs, resulting in foreign, farm-raised shrimp underselling domestic shrimp in the U.S. market. As such, these practices are unreasonable and impose a significant burden on, and restriction of, U.S. commerce.

The USTR's *Report in Section 301 Investigations: Report on the Acts, Policies and Practices of Various Economies Related to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced with Forced Labor* appropriately recognizes that the *2024 List of Goods Produced by Child Labor or Forced Labor* from the U.S. Department of Labor, Bureau of International Labor Affairs (ILAB)[5] identified a number of downstream goods "produced with inputs that are produced with forced labor" including fish used for fish oil and fish meal.[6] Consistent with that recognition, Appendix C of the *Section 301 Forced Labor Report* attempts to document where an investigated country imported forced labor inputs and exported downstream products to the United States between 2021 and 2025.[7] The report explains that the USTR first identified countries that had imported merchandise under Harmonized Schedule (HS) code 0302.89 from certain sources and later exported merchandise classified as HS codes 0303.89, 0304.89, 1604.19, 1604.20, or 2301.20 to the United States.[8]

While this type of tracking is useful in describing how importation of inputs produced through forced labor by our trading partners distorts the U.S. market, the particular methodology utilized fails to address the most significant manner through which fish harvested through forced labor enters the United States. A 2024 report from the Food and Agriculture Organization of the United Nations observed that over 87 percent of fishmeal was used in aquaculture.[9] The same report stated that in 2022, for the first time, global production of farmed aquatic animals exceeded captured aquatic animals by volume.[10] Accordingly, fishmeal is heavily concentrated

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4 *Id.*

5 U.S. Department of Labor, Bureau of International Labor Affairs, *2024 List of Goods Produced by Child Labor or Forced Labor* (ILAB Sept. 5, 2024) ("*2024 TVPRA List of Goods*") at 125, 309-310, https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2023/2024-tvpra-list-of-goods.pdf

6 *Acts, Policies and Practices of Various Economies Related to the Failure to Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced with Forced Labor*, Office of the United States Trade Representative (USTR June 2, 2026) ("*Section 301 Forced Labor Report*") at 16, https://ustr.gov/sites/default/files/files/Press/Releases/2026/USTR%20Report%20Sec%20301%20FL%20301%206-2-26%20FINAL%20for%20upload.pdf.

7 *See id.* at 90-92.

8 *See id.* at 92.

9 *See* Food and Agriculture Organization of the United Nations, *The State of World Fisheries and Aquaculture* (2024) at 70 (figure reported for calendar year 2021), https://openknowledge.fao.org/server/api/core/bitstreams/a10e81b3-3fbd-4393-b7b6-6a926915a19a/content.

10 *Id.* at 112.

as an input of the global aquaculture industry, which now constitutes the majority of world aquatic animal production.

As ILAB explained in the *2024 TVPRA List of Goods*, the agency "believe{s} that fishmeal, fish oil, and animal feed produced in Thailand are produced with an input produced with forced labor, specifically fish produced in Thailand."[11] After summarizing the forced labor practices that characterize Thailand's marine fishing vessels, ILAB observes:

> Thailand-caught marine fish produced using forced labor is sorted and often mixed with imported marine fish that may or may not be caught using forced labor, tainting the Thai fish product supply chain. The catch is sold to fishmeal processors, where the fish is cleaned and squeezed or dried to produce fishmeal and fish oil.[12]

ILAB additionally explains that approximately 25 percent of the harvest of Thailand's marine fishing vessels are used to manufacture fishmeal, that this fishmeal is "primarily used to make animal feed for shrimp and poultry," and that the "majority of animal feed produced in Thailand is consumed domestically by shrimp and poultry farms, though Thailand exported $2.4 billion of animal feed in 2022 . . ."[13] These observations mean that a substantial amount of fish harvested through forced labor practices in Thailand enter the United States as either Thai-origin farmed shrimp raised on fishmeal manufactured in Thailand and, similarly, through farmed shrimp imported from countries other than Thailand that import and use Thai-manufactured fishmeal.

Addressing the related issue of fish harvested through illegal, unreported, and unregulated (IUU) fishing, the U.S. International Trade Commission (ITC) has recognized that IUU-harvested products enter the U.S. market as foreign, farm-raised seafood products raised on fishmeal manufactured from this fish. As the ITC found:

> IUU products are often used to make fishmeal and fish oil, products that aquaculture industries rely on for feed. IUU marine-capture products used in feed ingredients are estimated to be equivalent to nearly 9 percent of the harvested weight of farmed seafood exported to the United States in 2019.[14]

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11 *2024 TVPRA List of Goods* at 125.

12 *Id.*

13 *Id.* The submitters note that based on data available from UN Comtrade for Thai exports of fishmeal under Harmonized Schedule (HS) code 2301.20 for 2020 through 2024, 88 percent of the volume of Thailand's exports of fishmeal were to China, while 11 percent were to Vietnam. Although smaller than China in terms of quantity of exports, Thailand's exports to Vietnam of fishmeal grew by 298% percent in volume from 2023 to 2024.

14 U.S. International Trade Commission, *Seafood Obtained via Illegal, Unreported, and Unregulated Fishing: U.S. Imports and Economic Impact on U.S. Commercial Fisheries*, Inv. No. 332-575, USITC Pub. 5168 (Feb. 2021) ("*Section 332 IUU Report*") at 11.

The ITC's methodology differentiated between fishmeal and fish oil used as warmwater feed and fishmeal and fish oil used as coldwater feed, estimating that IUU marine capture products comprised 9.9 percent of fishmeal and 10.2 percent of the fish oil used to produce coldwater feed, but 12.2 percent of the fishmeal and fish oil used to produce warmwater feed.[15] Thereafter, the agency developed estimates of the share of aquaculture imports of individual species groups attributable to IUU marine fish capture products based on fishmeal/fish oil usage for the specific group, with a 6.6 percent total share calculated for U.S. warmwater shrimp imports, a 7.5 percent total share calculated for "Miscellaneous crustaceans (crayfish)" imports, a 4.3 percent share for catfish and pangasius imports, and a 2.7 percent share for tilapia imports.[16]

Consistent with the ITC's analysis, the principal way in which fish harvested through forced labor enters the U.S. market is through imported, farm-raised seafood products that are grown out with fishmeal as the primary input. The following section summarizes the pathways through which goods produced through forced labor enter the U.S. market as an input into farmed seafood, demonstrating that the failure to impose and effectively enforce a prohibition on the importation of goods produced with forced labor in at least seven countries is unreasonable and burdens or restricts U.S. commerce. For these reasons, the submitters strongly support the USTR's proposed action and request that any additional duties imposed encompass all seafood imports from these seven countries.

II. Importation of Forced Labor Produced Animal Feed into the Covered Countries Is an Unreasonable Burden on American Seafood Producers

On a country-by-country basis, the sub-sections below summarize the extent to which individual countries import relevant fish or fishmeal products that may be traced to the use of forced labor that, in turn, also export substantial amounts of shrimp and/or other aquacultured seafood products to the United States. As a result, the failure of these countries to prohibit the importation of goods produced through forced labor provides fish and shrimp farmers in each of these countries with low-cost inputs that, in turn, allow farmed shrimp and fish to be exported from these countries at artificially low prices, harming the U.S. catfish industry, the U.S. crawfish industry, the U.S. shrimp industry, and other American seafood producers.

A. Ecuador

Ecuador's failure to prohibit the importation of goods made wholly or in part with forced labor is an unreasonable practice.

Between 2020 and 2024, trade data indicates that Ecuador that 95 percent of the volume of fishmeal imported under Harmonized Schedule (HS) code 2301.20 originated in Peru.[17] Forced labor is an issue in the supply chain for the fish sector in Peru alongside other IUU

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15 *See id.* at 104-105.

16 *See id.* at 118 (Table 3.12).

17 UN Comtrade data for import volumes into Ecuador under HS code 2301.20 from 2020 through 2024. Note that data for 2023 were not available.

fishing practices.[18] Peru's fishmeal supply chain also presents a significant forced-labor risk. A 2024 study published by ILAB found that 32 percent of surveyed Peruvian fishers experienced forced labor, including 40 percent of industrial fishers.[19] The report further explains that Peru's anchovy catch is overwhelmingly processed into fishmeal and fish oil.[20] The Changing Markets Foundation reports that Peru is the world's largest producer of fishmeal and fish oil, accounting for roughly one-third of global production, and identifies systemic governance and labor-related risks within the sector.[21]

Because Ecuador relies overwhelmingly on Peruvian fishmeal as a key input in the country's production of shrimp through aquaculture, Ecuador's failure to effectively enforce a prohibition on the importation of goods produced with forced labor allows inputs derived from forced labor to enter shrimp production destined for export to the United States, suppressing production costs and distorting competition. For these reasons, the submitters strongly support the USTR's proposal to impose an additional *ad valorem* tariff of 10 percent on imported merchandise from Ecuador and believe that these additional duties must be imposed on all seafood products imported under Chapters 3, 1603, 1604, and 1605 of the Harmonized Tariff Schedule of the United States (HTSUS).[22]

B. China

China's failure to prohibit the importation of goods made wholly or in part with forced labor is likewise unreasonable.

According to data available through UN Comtrade for imports into China under HS code 2301.20 between 2020 and 2024, 44 percent of the volume of China's imports of fishmeal are from Peru, with another 11 percent from Vietnam, and 6 percent from Thailand.[23]

As noted above, forced labor is an issue in the supply chain for the fish sector in Peru alongside other IUU fishing practices.[24] As also discussed above, the U.S. federal government

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18 *Section 332 IUU Report* at 117.

19 U.S. Department of Labor, Bureau of International Labor Affairs, *Report: Supply Chain Study on Forced Labor and Child Labor in the Fish Industry in Peru* (Sept. 2024) at vi and 3, https://www.dol.gov/sites/dolgov/files/ILAB/Supply-Chain-Peru-Fish-508.pdf.

20 *Id.*

21 *See generally* Changing Markets Foundation, *What Lies Beneath: Uncovering the Truth About Peru's Colossal Fishmeal and Fish Oil Industry* (Nov. 2020), https://changingmarkets.org/report/what-liesbeneath-uncovering-the-truth-about-perus-colossal-fishmeal-and-fish-oil-industry/.

22 *See Request for Comments* at 34,274.

23 UN Comtrade data for import volumes into China under HS code 2301.20 from 2020 through 2024.

24 *See Section 332 IUU Report* at 117; U.S. Department of Labor, Bureau of International Labor Affairs, *Report: Supply Chain Study on Forced Labor and Child Labor in the Fish Industry in Peru* (Sept. 2024) at vi and 3, https://www.dol.gov/sites/dolgov/files/ILAB/Supply-Chain-Peru-Fish-508.pdf; and Changing Markets Foundation, *What Lies Beneath: Uncovering the Truth About Peru's Colossal Fishmeal and Fish*

recognizes that forced labor characterizes Thailand's marine fishing industry and that significant volumes of the fish harvested through forced labor is used to manufacture fishmeal. Additionally, fish from Vietnam is identified by ILAB in the *2024 TVPRA List of Goods*[25] and the U.S. Department of State has separately registered concerns regarding the Vietnamese government's enforcement of labor laws in the nation's fishing industry:

> Observers reported the government did not adequately implement fisheries laws and regulations or monitor the domestic fishing fleet; however, the government made some efforts to prosecute and convict individuals allegedly in violation of the fisheries law. Officials reportedly lacked appropriate resources and trainings to adequately enforce labor laws in the fishing sector.[26]

Because the majority of the volume of imports of fishmeal – a key input in the country's aquaculture production – originate from countries found to have forced labor practices in their harvest of fish, China's failure to impose and effectively enforce a prohibition on the importation of goods produced with forced labor allows inputs derived from forced labor to enter aquaculture production (including catfish, crawfish, and shrimp production) destined for export to the United States, suppressing production costs and distorting competition. For these reasons, the submitters strongly support the USTR's proposal to impose an additional *ad valorem* tariff of 12.5 percent on imported merchandise from China and believe that these additional duties must be imposed on all seafood products imported under HTSUS Chapters 3, 1603, 1604, and 1605.[27]

C. India

India's failure to prohibit the importation of goods made wholly or in part with forced labor is an unreasonable practice.

According to data available through UN Comtrade for imports under HS code 2301.20 for the most recent year available (2024), over 10 percent of the volume of fishmeal imported into India originated from Thailand.[28] As discussed above, the U.S. federal government recognizes that forced labor characterizes Thailand's marine fishing industry and that significant volumes of the fish harvested through forced labor is used to manufacture fishmeal.

From 2020 through 2024, UN Comtrade data for imports under HS code 2301.20 indicates that 27 percent of the volume of fishmeal imported into India originated in Oman.[29] Public media reports indicate that there is widespread use of forced labor on fishing vessels

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Oil Industry (Nov. 2020), https://changingmarkets.org/report/what-liesbeneath-uncovering-the-truth-about-perus-colossal-fishmeal-and-fish-oil-industry/.

25 *See 2024 TVPRA List of Goods* at 25.

26 U.S. Department of State, *2025 Trafficking in Persons Report* (Apr. 2026), https://www.state.gov/reports/2025-trafficking-in-persons-report/vietnam/.

27 *See Request for Comments* at 34,274.

28 UN Comtrade data for import volumes into India under HS code 2301.20 for 2024.

29 UN Comtrade data for import volumes into India under HS code 2301.20 from 2020 through 2024.

operating out of Oman. Specifically, a recent investigative news article traced the complicated nature of fishing industry operations organized in and operating out of Oman while flagged by other countries that engage in forced labor practices.[30] In addition, Appendix C of the *Section 301 Forced Labor Report* observes that Oman imported forced labor inputs during the period running from 2021 through 2025, indicating that such imports may have also been used in the production of fishmeal exported from Oman to India.[31]

Because a significant portion of the volume of imports of fishmeal – a key input in India's farmed shrimp production – originate from Oman and Thailand, India's failure to impose and effectively enforce a prohibition on the importation of goods produced with forced labor allows inputs derived from forced labor to enter shrimp production destined for export to the United States, suppressing production costs and distorting competition. Further, India is identified in Appendix C of the *Section 301 Forced Labor Report* as importing forced labor inputs and exporting downstream products related to fish to the United States during the period running from 2021 through 2025.[32] For these reasons, the submitters strongly support the USTR's proposal to impose an additional *ad valorem* tariff of 12.5 percent on imported merchandise from India and believe that these additional duties must be imposed on all seafood products imported under HTSUS Chapters 3, 1603, 1604, and 1605.[33]

D. Indonesia

Indonesia's failure to prohibit the importation of goods made wholly or in part with forced labor is an unreasonable practice.

From 2020 through 2025, UN Comtrade data for imports under HS code 2301.20 indicates that 11 percent of the total fishmeal volume into Indonesia originated from India, 4 percent from Thailand, and 2 percent from Vietnam.[34] Moreover, the trade data available through UN Comtrade indicates that the volume of Indonesia's imports of fishmeal from India has increased substantially since 2022 and, in 2025, comprised over 30 percent of the total volume of Indonesia's fishmeal imports.[35]

As discussed above, the U.S. federal government recognizes that forced labor characterizes Thailand's marine fishing industry and that significant volumes of the fish harvested through forced labor is used to manufacture fishmeal. As also discussed above, fish

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30 Jeff Joseph, "*The Indian Fishers Trafficked Into Illegal Operations in Oman*," New Lines Magazine (Oct. 27, 2025), https://newlinesmag.com/reportage/the-indian-fishers-trafficked-into-illegal-operations-in-oman/.

31 *See Section 301 Forced Labor Report* at 91.

32 *See id.* at 90.

33 *See Request for Comments* at 34,274.

34 UN Comtrade data for import volumes into Indonesia under HS code 2301.20 from 2020 through 2025.

35 *Id.*

from Vietnam is identified by ILAB in the *2024 TVPRA List of Goods*[36] and the U.S. Department of State has separately registered concerns regarding the Vietnamese government's enforcement of labor laws in the nation's fishing industry.[37] Similarly, public media reports indicate that there is widespread use of forced labor on Indian fishing vessels.[38] In addition, Appendix C of the *Section 301 Forced Labor Report* observes that India imported forced labor inputs during the period running from 2021 through 2025, indicating that such imports may have also been used in the production of fishmeal exported from India to Indonesia.[39]

Because a significant portion of the volume of imports of fishmeal – a key input in Indonesia's farmed shrimp production – originate from Thailand, Vietnam, and India, Indonesia's failure to effectively enforce a prohibition on the importation of goods produced with forced labor allows inputs derived from forced labor to enter shrimp production destined for export to the United States, suppressing production costs and distorting competition. Further, Indonesia is identified in Appendix C of the *Section 301 Forced Labor Report* as importing forced labor inputs and exporting downstream products related to fish to the United States during the period running from 2021 through 2025.[40] For these reasons, the submitters strongly support the USTR's proposal to impose an additional *ad valorem* tariff of 10 percent on imported merchandise from Indonesia and believe that these additional duties must be imposed on all seafood products imported under HTSUS Chapters 3, 1603, 1604, and 1605.[41]

E. Thailand

Thailand's failure to prohibit the importation of goods made wholly or in part with forced labor is an unreasonable practice.

According to data available through UN Comtrade for imports into Thailand under HS code 2301.20 between 2020 and 2024, 54 percent of the volume of fishmeal imported in Thailand originated from Myanmar (Burma), with another 18 percent from Vietnam. As with fish from Vietnam, fish from Myanmar (Burma) is identified by ILAB in the *2024 TVPRA List of Goods*.[42]

Because the majority of the volume of imports of fishmeal – a key input in the country's aquaculture production – originate from Myanmar and Vietnam, Thailand's failure to impose

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36 *See 2024 TVPRA List of Goods* at 25.

37 U.S. Department of State, *2025 Trafficking in Persons Report* (Apr. 2026), https://www.state.gov/reports/2025-trafficking-in-persons-report/vietnam/.

38 *See*, *e.g.*, Shreya Dasgupta, "*Hard labor in India's Fisheries: An Interview with Researcher Divya Karnad*," Mongabay (May 19, 2016), https://news.mongabay.com/2016/05/migrant-labor-works-appalling-conditions-indias-fisheries-industry-interview-fisheries-researcher-divya-karnad/.

39 *See Section 301 Forced Labor Report* at 90.

40 *See Section 301 Forced Labor Report* at 90.

41 *See Request for Comments* at 34,274.

42 *See 2024 TVPRA List of Goods* at 20 and 25.

and effectively enforce a prohibition on the importation of goods produced with forced labor allows inputs derived from forced labor to enter aquaculture production destined for export to the United States, suppressing production costs and distorting competition. Further, Thailand is identified in Appendix C of the *Section 301 Forced Labor Report* as importing forced labor inputs and exporting downstream products related to fish to the United States during the period running from 2021 through 2025.[43] For these reasons, the submitters strongly support the USTR's proposal to impose an additional *ad valorem* tariff of 12.5 percent on imported merchandise from Thailand and believe that these additional duties must be imposed on all seafood products imported under HTSUS Chapters 3, 1603, 1604, and 1605.[44]

F. Vietnam

Vietnam's failure to prohibit the importation of goods made wholly or in part with forced labor is an unreasonable practice.

According to data available through UN Comtrade for imports into Vietnam under HS code 2301.20 between 2020 and 2023, 29 percent of the volume of fishmeal imported into Vietnam originated from India, 18 percent from Peru, 8 percent from Thailand, and 5 percent from China.[45] Further, data available through UN Comtrade regarding Thailand's exports under HS code 2301.20 indicate that the country increased exports of fishmeal to Vietnam by 298 percent from 2023 to 2024.[46]

As discussed above, there has been significant documentation of forced labor practices in the commercial fishing industry in Peru and public media reports indicate that there is widespread use of forced labor on Indian fishing vessels. Further, Appendix C of the *Section 301 Forced Labor Report* observes that India imported forced labor inputs during the period running from 2021 through 2025, indicating that such imports may have also been used in the production of fishmeal exported from India to Vietnam.[47] As also discussed above, the U.S. federal government recognizes that forced labor characterizes Thailand's marine fishing industry and that significant volumes of the fish harvested through forced labor is used to manufacture fishmeal. Moreover, fish from China is also identified by ILAB in the *2024 TVPRA List of Goods*.[48]

Because the majority of the volume of imports of fishmeal – a key input in Vietnam's aquaculture production – originate from India, Peru, Thailand, and China, Indonesia's failure to

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43 *See Section 301 Forced Labor Report* at 91.

44 *See Request for Comments* at 34,274.

45 UN Comtrade data for import volumes into Vietnam under HS code 2301.20 from 2020 through 2023.

46 UN Comtrade data for export volumes from Thailand under HS code 2301.20 from 2023 through 2024. In 2024, Thailand exported 18,805,360 kilograms of fishmeal under HS Code 2301.20 to Vietnam amounting to 20,729 tons.

47 *See Section 301 Forced Labor Report* at 90.

48 *See 2024 TVPRA List of Goods* at 20.

impose and effectively enforce a prohibition on the importation of goods produced with forced labor allows inputs derived from forced labor to enter aquaculture production (including basa, tra, swai, and shrimp) destined for export to the United States, suppressing production costs and distorting competition. Further, Vietnam is identified in Appendix C of the *Section 301 Forced Labor Report* as importing forced labor inputs and exporting downstream products related to fish to the United States during the period running from 2021 through 2025.[49] For these reasons, the submitters strongly support the USTR's proposal to impose an additional *ad valorem* tariff of 12.5 percent on imported merchandise from Vietnam and believe that these additional duties must be imposed on all seafood products imported under HTSUS Chapters 3, 1603, 1604, and 1605.[50]

G. Mexico

Mexico's failure to prohibit the importation of goods made wholly or in part with forced labor is an unreasonable practice.

According to data available through UN Comtrade for imports into Mexico under HS code 2301.20 between 2020 and 2023, roughly 60 percent of the volume of fishmeal imported into Mexico originated from Peru.[51] As discussed in detail above, there has been significant documentation of forced labor practices in the commercial fishing industry in Peru.

Because Mexico relies overwhelmingly on Peruvian fishmeal as a key input in the country's production of shrimp through aquaculture, Mexico's failure to effectively enforce a prohibition on the importation of goods produced with forced labor allows inputs derived from forced labor to enter shrimp production destined for export to the United States, suppressing production costs and distorting competition. For these reasons, the submitters strongly support the USTR's proposal to impose an additional *ad valorem* tariff of 10 percent on imported merchandise from Mexico and believe that these additional duties must be imposed on all seafood products imported under HTSUS Chapters 3, 1603, 1604, and 1605.[52]

III. Conclusion

The above-described acts, policies, and practices are unreasonable and distort market conditions in a manner that burdens and restricts United States commerce, as American seafood producers are unable to compete, expand, or make long-term investments under while foreign suppliers to the U.S. market utilize inputs produced through forced labor. Accordingly, the submitters support the USTR's proposed actions, particularly in response to the unreasonable acts, policies, and practices of China, Ecuador, India, Indonesia, Mexico, Thailand, and Vietnam,

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49 *See Section 301 Forced Labor Report* at 91.

50 *See Request for Comments* at 34,274.

51 UN Comtrade data for import volumes into Mexico under HS code 2301.20 from 2020 through 2023.

52 *See Request for Comments* at 34,274.

and request that additional duties be imposed on all seafood products imported from these seven countries under Chapters 3, 1603, 1604, and 1605 of the HTSUS.

Respectfully submitted,

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