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Dr. Julie Callahan Assistant U.S. Trade Representative for Agriculture Via e-mail: jcallahan@ustr.eop.gov March 4, 2025

Dr. Callahan,

We write to support the implementation of import tariffs on shellfish shipped to the U.S.

The ECSGA supports over 2,000 shellfish farms from Maine to Texas that collectively harvest over \$190M in sustainably farmed shellfish. Shellfish farming is the largest segment of marine aquaculture in the U.S. today, and we employ thousands in rural coastal communities where we make significant contributions to our local economies.

Structural and economic forces place U.S. farmers at a distinct disadvantage to our trade competitors in several countries. Several of our competitors enjoy substantial government subsidies and reduced regulatory costs. They have much lower regulatory costs and can establish extremely large farms, allowing them to take advantage of superior economies of scale. The relative strength of the U.S. dollar means that shellfish are coming into our markets at a significant discount.

The U.S. is importing \$60M worth of oysters from Canada and another \$15M of oysters from Mexico. Canada also sends us \$23M in clams and \$32M in mussels, while New Zealand ships \$58M in mussels. Our members tell us that import statistics for clams coming in from China and Vietnam are not being accurately captured but are significant and harming our ability to compete in our domestic markets. Many of our trading partners have also indicated intentions to increase shipments to our shores significantly. Our ability to increase production is impaired by imports that continue to grow and take market share away from domestic producers.

The U.S. imports 75-85% of the seafood we consume, adding an estimated \$24.2B to the trade deficit annually. We could grow more shellfish in U.S. waters, but we are challenged to compete with imported products that can significantly undercut our prices. Now is the time to boost local farms and coastal economies. We welcome your support.

Sincerely,

Robert B. Rheault, Ph.D. Executive Director bob@ECSGA.org (401) 783-3360