

Port Issues Causing Logistical ‘Disaster’ for Exporters, Importers

For weeks, dozens of container ships have dotted the waters of California’s San Pedro Bay, waiting to unload at a port experiencing its highest level of congestion in years. With no space to drop their cargo, the ships sit in limbo, further slowing imports and exports and clogging a global trading system that some shippers view as broken.

“We’re working 12, 14 hours a day trying to figure out all of this logistics,” said Richard Benavides, vice president-operations for Coast Beacon, a California-based seafood distributor. “It’s an absolute disaster.”

Ports nationally and globally are struggling to handle the complex logistics of supply chains affected by a public health pandemic that has stretched about a year, with the Los Angeles and Long Beach ports in California especially hard hit. A number of troubling issues that have persisted for months are slowing exports and imports, industry experts said: a shortage in skilled labor due to COVID-19 outbreaks; a severe lack of empty containers, equipment and storage space; steep increases in container fees; and a steady accrual in detention and demurrage fees.

While backups at the California ports are slowing imports to unprecedented levels, the delays are also having trickle-down effects on exports. Ocean carriers are increasingly running out of capacity and containers to carry shipments for U.S. exporters, leading to declined bookings and millions of dollars in stranded exports, industry representatives said. “The system just does not work in the way it’s supposed to work anymore. It’s not just the increased costs—it’s delays, it’s uncertainty,” said David Monroe, a transportation lawyer who represents the National Customs Brokers & Forwarders Association of America. “You can’t count on anything.”

No government body had been able to provide relief. Industry has pleaded with the Federal Maritime Commission

to “explore all available powers” to suspend what trade groups say are unfair detention and demurrage fees (see [ITT 11/17/2020](#)), but experts said it’s unclear what authority the commission has to address the fees, many of which are negotiated in contracts. “The FMC probably believes there’s a real question about whether they have the authority to first suspend demurrage and detention, and they probably also have a question about whether that’s a good idea,” Monroe said. Although shippers can ask the FMC to mediate certain fee disputes, Monroe said he has “not seen any of those things resolved in any way.” The FMC didn’t comment.

The commission in November began investigating whether ocean carriers are violating regulations on detention and demurrage fees, container returns and container availability for U.S. exports (see [ITT 11/20/2020](#)), and has been reviewing broader supply chain issues caused by the COVID-19 pandemic since at least April 2020 (see [ITT 04/07/2020](#)).

FMC commissioners have asked the Biden administration to prioritize COVID-19 vaccinations for transport and maritime workers. Port and warehousing unions have reported more than a thousand coronavirus cases since March, the commissioners said in a Jan. 28 [letter](#) to President Joe Biden, hampering ports’ ability to move cargo. “A large-scale workforce disruption from COVID-19 would be disastrous,” the letter said.

As more maritime workers become sick and as more U.S. exports become stranded, shippers are increasingly turning to air freight, Peter Friedmann, executive director of the Agriculture Transportation Coalition, told the Massachusetts Export Center during a virtual conference in January. Friedmann said that has led to more competition for air freight space. “There are millions of dollars and tens of thousands of containers of exports that could be leaving the United States that are not leaving, certainly not on schedule, some delayed as much as a month,” he said. “People are desperately trying to ship things overseas.”

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Certain container rates have gone “sky-high,” Monroe said. He said he has heard of some rates nearly doubling, from \$5,000 a container to as high as \$9,000. “That impacts not just shippers, but intermediaries as well,” he said. “Suddenly your costs go up 50%, and the prices you quoted to your customer were based upon an expectation that the rates would be a lot lower, and now you're in a world of trouble.”

Monroe also said detention and demurrage fees are “going through the roof” as shippers cannot to pick up their containers from terminals, sometimes because of a truck back-up at the port. “If you're talking about one container, we're talking about hundreds of dollars. If you're talking about a large number of containers, you're talking thousands,” he said. “We're seeing demurrage issues in the hundreds of thousands.”

Coast Beacon's Benavides said the fees are a problem for companies that didn't negotiate extended container days into their contracts. He said his company has favorably negotiated contacts and has built in contingency plans for its supply chain, but others struggle. “Some people went from paying \$4,000 a container to \$13,000 a container,” he said. “It's not like those people can go back and ask their customers for increases of that astronomical amount.”

With much of the economy hampered due to the pandemic, Benavides expects the rates and port congestion to worsen. Until enough of the country is vaccinated, he expects the supply chain logjam to continue and container ships to remain stalled outside ports, waiting to unload. “I don't remember a time we had this many ships out there,” he said. “It's unprecedented. I've never seen it this bad. Ever.”
— *Ian Cohen*

FMC to Demand Information From Ocean Operators About Unfair Detention, Demurrage Charges

The Federal Maritime Commission will begin issuing information demand orders to ocean carriers and terminal operators to determine if they are violating detention and demurrage practices, the FMC [said](#) Feb. 17. The orders will be sent to ocean carriers operating in an alliance and calling at the Port of Los Angeles, the Port of Long Beach or the Port of New York and New Jersey, and will require them to provide information on how they impose detention and demurrage charges, and their policies related to con-

tainer returns and container availability for exporters (see 2012090009), the commission said.

Information received from the demand orders, which will be issued by Commissioner Rebecca Dye as part of the FMC's investigation into unfair detention and demurrage fees (see [ITT 11/20/2020](#)), may be used “as a basis for hearings, Commission enforcement action or further rulemaking,” the FMC said. Shippers have complained of unfair fees, skyrocketing container rates, equipment shortages and terminal congestion at ports across the country, and especially at Los Angeles and Long Beach (see 2102020050).

New Clean Truck Fee at Ports of LA/LB Could Take Effect in Second Half 2021

A new fee on cargo passing through the ports of Los Angeles and Long Beach may start in the second half of 2021, a Port of Los Angeles spokesperson said, citing remarks from port staff at a Jan. 27 meeting. But each port's harbor commission will need to vote to approve a start date for the Clean Truck Fund rate before the fee begins, the spokesperson said. Approved in March 2020, the fee will be assessed at \$10 per twenty-foot equivalent unit (TEU)—to be paid by the beneficial cargo owner—for loaded containers hauled by heavy-duty trucks that enter or exit port terminals. The fee is intended to incentivize adoption of zero emissions trucks, which will be exempt from the fee. The ports are also considering exemptions for low nitrogen oxide trucks. Implementation of the fee has been delayed by the COVID-19 pandemic, the spokesperson said.

USTR Nominee Says Solving Airbus Dispute, Enforcing Labor in USMCA Top Priorities

U.S. trade representative nominee Katherine Tai said that despite the president's prioritizing of the domestic economy, “I don't expect, if confirmed, to be put on the back burner at all.” Tai, a veteran of the House Ways and Means Committee trade staff, faced largely friendly questioning over a more-than-three-hour [hearing](#) in the Senate Finance Committee on Feb. 25.

As is common with executive branch nominees, she more often promised to cooperate with senators on their concerns than she took specific positions. But she did say that using

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the rapid response mechanism of USMCA over Mexican labor issues would be a top priority, in response to a question from Committee Chairman Ron Wyden, D-Ore., the co-author of the mechanism. The other co-author, Sen. Sherrod Brown, D-Ohio, asked her if she would use the mechanism to the maximum extent possible, and she said yes.

Tai also committed to making negotiations to solve the Airbus-Boeing dispute a top priority. Responding to Sen. Maria Cantwell, D-Wash., she said, “It is arguably one of the disputes that started to break the WTO dispute settlement system. If confirmed, I would very much be interested in figuring out, pardon the pun, how to land this particular plane because it has been going on for a very long time.”

Sen. Bob Menendez, D-N.J., also asked about the dispute, because, he told Tai, he’s hearing a lot from food importers and restaurants who are being hurt by 25% tariffs on wines, cheeses and other foodstuffs, which he noted have nothing to do with airplanes. “I know the disruption and the pain that these particular tariffs are imposing on the affected stakeholders,” Tai said. “I also want to acknowledge that this is part and parcel of the long-standing aircraft dispute between the U.S. and [European Union] and, in some ways, this is the way the WTO system is supposed to work, you inflict pain on each other stakeholders to try to motivate each other to come to a resolution.” She said she’d like to find ways to figure out that resolution, so the tariffs can be lifted.

No senator asked if the administration wants to revise or remove the most significant tariffs of the last few years, the Section 301 tariffs on China. But Sen. James Lankford, R-Okla., asked her how she would treat the Section 301 exclusion process. “I know the 301 tariffs have touched directly a lot of people, and have disrupted a lot of people’s lives and livelihoods,” she said, and she said she’s also aware that companies have many concerns with the exclusion process. She said it’s very high on her list, to assess the process in place for the exclusions, and to make sure it’s transparent, predictable, and offers due process.

Lankford urged her to improve the speed of decisions, and not to let exclusions expire after one year. He said companies can’t plan that way.

She was also asked about Section 232 tariffs on steel and aluminum, which fall under Commerce’s purview, but she

said she would hope to work closely with the department on what to do about these tariffs.

“I also want to say that with respect to tariffs that the tariffs are a legitimate tool in the trade toolbox,” particularly for trade remedies. “Having said that, I think that with respect to the 232 tariffs on steel and aluminum that you mentioned, we have to acknowledge that we have, overall, very significant global marketplace problem in the steel and aluminum markets that are driven primarily by China’s overcapacity that it’s built in production of these materials, but it’s not, it’s not just a Chinese problem.” She said there may need to be a slew of tools to solve that problem.

Sen. Todd Young, R-Ind., asked her directly if former USTR Robert Lighthizer had the right approach in his efforts to get more companies to set up manufacturing in the U.S.

“There’s been a lot of disruption and consternation that have accompanied some of those policies,” she said diplomatically, as she praised the hard work that went into the Section 301 report laying out the scope of the problems with China’s trade abuses. “I want to accomplish similar goals in a more effective process-driven manner.” Tai, a fluent Mandarin speaker, and former career USTR staffer who prosecuted China cases, was asked repeatedly about how to deal with the challenge of China’s distortions in trade, whether through industrial subsidies, intellectual property theft or forced technology transfer, and a number of other concerns.

She seemed to caution Sen. Chuck Grassley, R-Iowa, that he may need to moderate his expectations for structural reform in China, even those it promised to do under the phase one agreement. “I think that we would all be delighted to have those structural changes in China to have our economies maybe more compatible,” she said. “I think it is absolutely worth exploring with China, but I also want to note that those are conversations, those are roads that have been well-worn by U.S. trade representatives before me, and so on this issue of the U.S.-China trade relationship, I would like to say that we need to be exploring all of our options.”

In response to another senator’s question, she said one way to press China to reform its distorting practices could be by

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enforcing agreements it struck with trading partners, or by the rules of the World Trade Organization it agreed to when it joined the body. “There are also a lot of areas that are gray areas where the rules are not clear, or where we don’t have rules yet,” she said, and said that maybe allies could work together to write more rules.

Several senators suggested that returning to the Trans-Pacific Partnership would be an effective way to join with allies to constrain China, but she said that while the concept was good, “a lot has changed in terms of our own awareness about some of the pitfalls of the trade policies that we’ve pursued.” She also said that globalization has often led to a race to the bottom, in terms of both environmental and labor standards, and the U.S. has to rethink its strategies on trade policy to prevent that from happening.

She also was asked about smaller tariff issues. Sen. Catherine Cortez Masto, D-Nev., asked Tai to endorse her idea of adding gender equity provisions to the Generalized System of Preferences eligibility requirements, but Tai just said she would engage, and that she wants the GSP program to continue.

Cantwell asked if India could come back into the GSP program, which she thinks could help lower tariffs on Washington’s apple exports. Tai said she hadn’t been briefed on India and GSP, but said that renewing the program is “very high on my radar.”

Ways and Means ranking member Kevin Brady, a Texas Republican who praised the choice of Tai as he helped introduce her to the panel, said he hopes Tai will engage with Congress to get unfinished business done, renewing both GSP and the Miscellaneous Tariff Bill.

Cortez Masto also complained to Tai that the safeguard tariffs against imported solar panels was supposed to step down to 15% in 2021, but instead the tariff is 18%, and said

that she’s concerned the tariffs will go beyond the four-year schedule. She said there were fewer solar installation jobs as a result.

“I think that one of the challenging aspects of a case like this one is that you have petitioners here in the United States who sought the review and won the remedy. Because it has impacts on different sides of the industry in the United States, where we find ourselves really challenged to figure out how to thread the needle in a situation where an industry is trying to stay afloat in the face of China cornering the market on solar panels, so I wanted to start by acknowledging that this is a really tough issue,” Tai said. She said her office would engage with the Section 201 case, and she’d keep the senator apprised. Cortez Masto was pleased, saying, “I think that’s so helpful.”

Several senators asked her if she would restart the United Kingdom trade negotiations, but she said she needed to find out how much progress they’ve made, and she also said negotiating priorities could have changed over the two years since negotiations began.

Several Democrats complained about how President Donald Trump had isolated the U.S. from its allies by sparking trade wars with friend and foe alike, and suggested that China could be more effectively contained if Japan, South Korea, Europe and the U.S. joined forces.

“I want to acknowledge right up front that working with others is hard work,” Tai said. “And I think that that hard work begins by engaging, reaching out and having the conversations which will sometimes be quite difficult about how we can work together, and how we can capitalize on our shared interests to make more effective policy together.”

Some of the toughest questioning came from Sen. Elizabeth Warren, D-Mass., who pressed Tai to change the compo-

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sition of trade advisory committees and to provide draft negotiating text at least two months ahead of a request for Congress to begin the fast-track process of ratifying a free trade deal.

On the former, Tai said there's a statute that governs the makeup of the committees, and on the latter, she said she was committed to transparency broadly.

"If the administration won't promise [this], we're never going to get beyond a trade policy that leaves American families on the losing side. This needs to happen," Warren replied.

Sen. Pat Toomey, R-Pa., also expressed sharp disappointment with Tai's refusal to say that when trying to reach a deal with another advanced economy, the goal should be no tariffs, no non-tariff barriers and no quotas. "Maybe if you had put this question to me five or 10 years ago, my answer would have been yes," Tai said. "I think our trade policies need to be nuanced and need to take into account all of the lessons that we have learned, many very painful, from our most recent history." — *Mara Lee*

Neal Says GSP Will Be Renewed Retroactively This Year

House Ways and Means Committee Chairman Richard Neal, D-Mass., told an online audience Feb. 9 during a Washington International Trade Association [conference](#) that the Generalized System of Preferences benefits program will be restored this year, and that the benefits will be retroactive. He added, "I think that for all of its past successes, and I have been a supporter, it needs to be updated to keep us in line with progress as it relates to trade policy."

Trade Subcommittee Chairman Earl Blumenauer, D-Ore., introduced a rewrite of GSP late last year that would evaluate whether countries covered by GSP have established or are making continual progress toward establishing "the rule of law, political pluralism, the right to due process, a fair trial and equal protection under the law," and whether those countries are working to "reduce poverty, increase the availability of health care and educational opportunities," among other goals, including combating corruption. It also would predicate eligibility on whether a country effectively enforces its environmental laws and regulations, and is ful-

filling its international environmental obligations, including those related to public health (see [ITT 12/08/2020](#)).

In terms of new initiatives, Neal said he's looking forward to using "our trade tools and policies to help counteract the effects of climate change." He also said he's hopeful that negotiations with the United Kingdom and Kenya can be completed in 2021, for new trade deals. "I'll leave it to you who are trade experts, if you can get past the chlorinated chicken issue. It's ... kind of a challenge, but I'm looking forward to it."

On trade compliance, Neal also addressed the enforcement of bans on goods made with forced labor. "I, like most of you, are troubled by China's forcible assimilation of Muslim and other religious minority populations, including the use of concentration camps and forced labor. Forced labor places negative pressure on the rights of workers around the world, and companies that abide by high standards are also much affected. I'm committed to working with colleagues in Congress, the Biden administration, civil society, the private sector, and our trading partners to create a plan for more rigorous enforcement of forced labor laws."

He later elaborated on how tackling forced labor isn't just a matter of withhold release orders. "The conditions in [China's] Xinjiang [region], coupled with the nature of global supply chains, highlights the need to work with our allies to come up with a global solution," he said. "It's imperative that every country does their part to confront China, and ensure their countries did not become vessels for products made with forced labor."

Neal said enforcement of Canada's and Mexico's commitments under USMCA, particularly the use of the rapid response mechanism over labor abuses in Mexico, will be a priority this year. "It's not good enough, as you know, just to create new tools and leave them on the shelf. We need to use those tools," he said. — *Mara Lee*

Risk from Section 301 Tariffs on Vietnam Over Currency Seen as 'Low-Medium'

Even though a Section 301 investigation on Vietnamese currency manipulation found there was cause to believe the practice is burdening U.S. business (see [ITT 01/15/2021](#)), Crowell & Moring lawyer Michael Bowen said the firm

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does not assign much additional risk to imports from Vietnam based on its currency practices. “Let’s call it ‘low-medium’ for now,” Bowen said in an email following up on a Feb. 17 Crowell & Moring webinar (see [ITT 02/17/2021](#)). He said not only did the Office of the U.S. Trade Representative choose not to impose any tariffs in January at the time of its finding, it also “failed to signal any imminent measures in its notice.” Bowen also noted that the first time Commerce used currency undervaluation as a countervailable subsidy, on passenger tires, it was an average of 1.4% across the two companies under review. This “showed this may be more bark than bite for importers.” — *Mara Lee*

More Than 150 Trade Groups Ask for Section 301 Exclusions to Return

Trade groups representing importers, exporters and companies involved in trade logistics are asking Congress to ask the Office of the U.S. Trade Representative to retroactively extend Section 301 exclusions for products whose exclusions expired last year, automatically extend exclusion for pandemic response goods, and reinstate the exclusions process. The 166 groups, which make up the Americans for Free Trade coalition, sent a [letter](#) to Congress Jan. 29 with the requests.

The letter suggests that removing all the Trump era tariffs would be an economic boost, and says that the country’s tariff policy needs immediate attention. “Over the last several years, American businesses and families have been assessed more than \$85 billion in additional tariffs. These tariffs have resulted in less money in the pockets of American families, a slowdown in U.S. manufacturing, and decreased competitiveness for American businesses vis-à-vis their counterparts in Europe and Asia,” they said.

While Congress does not have the authority to roll back sections 301, 232 or 201 tariffs, the groups said Congress should ask the U.S. International Trade Commission to undertake an economic analysis on how tariffs impacted American jobs, manufacturing, competitiveness, innovation, and economic growth. — *Mara Lee*

CIT Assigns Section 301 China Tariff Cases to 3-Judge Panel

A three-judge Court of International Trade panel will oversee all cases tackling the legality of lists 3 and 4 Section

301 China tariffs, Chief Judge Timothy Stanceu said in an order signed Feb. 5. Judges Mark Barnett, Claire Kelly and Jennifer Choe-Groves—the three most senior active judges on the court—were assigned to hear one of the largest mass filings in the court’s history.

All three are appointees of President Barack Obama. [Barnett](#) and [Kelly](#) both assumed office in May 2013, [Choe-Groves](#) in June 2016. Lawyers we canvassed said the development was a good one because it means adjudication is really going to start now. The order came more than 18 weeks since Akin Gump’s motion for the three-judge panel. Attorneys believe the delay was to give the three judges a chance to study the complaints. “They got a handle on it before they issued the order, rather than issuing this and then trying to get a handle on it,” one attorney said. “Now they’re ready to go.”

One should read nothing into the fact that all three judges are Obama appointees, another attorney said. The court’s rationale was to pick the judges with the most experience, without choosing any of the more elderly judges because the litigation likely will take years to resolve, he said: “These are not political judges.”

All three judges have no-nonsense reputations, with the ability to take control of unwieldy cases, several of the attorneys we polled said. All praised Barnett, a former Treasury Department attorney, as a straight shooter and a stickler for holding the government to follow the rules. One of the attorneys said: “When the government tries to take shortcuts and stuff, he doesn’t like it. That’s kind of good in this case for our side.”

Another lawyer said he expects Barnett, who is seen as Stanceu’s likely successor when the chief judge retires, will move quickly on next steps. Barnett is known for not tolerating deadline extension requests, except in emergencies. Stanceu, a President George W. Bush appointee in 2003, turns 70 this year. Barnett is 58, Kelly is 56, and Choe-Groves, 52.

The challenge began in September 2020 when HMTX filed a lawsuit over lists 3 and 4A Section 301 tariffs on China (see [ITT 09/11/2020](#)); that suit was then followed by thousands of copycat suits. Jasco Products was later added as party to the HMTX lawsuit. HMTX and Jasco are listed

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as the representative parties for the whole of the Section 301 litigation and are represented by Akin Gump, which devised the legal theory for the case. “We are pleased to see that our case has been assigned to a three-judge panel, as we requested,” said Matthew Nicely, Akin Gump lead attorney for the HMTX case. “We look forward to working with the court and the other parties to establish a briefing schedule and a mechanism for addressing the large number of related cases that were filed following our HMTX/Jasco complaint.”

The court hasn’t said whether it will use the HMTX suit as a test case for the entire litigation. All the various lawsuits argue that the Office of the U.S. Trade Representative overstepped its Section 301 authority by imposing the lists 3 and 4A tariffs as retaliatory duties against the Chinese and violated the Administrative Procedure Act by conducting tariff rulemakings that lacked transparency. — **Jacob Kopnick**

Court Sets March 19 Deadline for Input on Selecting Section 301 Test Cases

The U.S. Court of International Trade plans to “proceed first” on choosing a “representative sample” of test cases to manage the roughly 3,500 Section 301 complaints inundating the court, said an order signed Feb. 16 by the three-judge panel of Mark Barnett, Claire Kelly and Jennifer Choe-Groves. All the suits seek to get the List 3 and List 4A Chinese tariffs vacated and the duties refunded with interest. “The court expects that the number of sample cases identified will be small enough to permit the efficient disposition of this litigation while allowing the court to consider all claims raised by the various Plaintiffs,” the order said. “The court anticipates issuing a stay of all Section 301 cases assigned to the panel that are not selected to proceed as sample cases.”

It set a March 19 deadline for plaintiff attorneys to submit a “coordinated proposal” on the test cases and to suggest lawyers to sit on a steering committee. Any lawyer who thinks their complaint “would not be represented by a sample case proposal” or feels they belong on the steering committee will have until March 26 to appeal, it said.

Most court observers expect the first-filed HMTX Industries/Jasco Products litigation is a shoo-in for one of the test

cases. Virtually all the complaints argue that the Office of the U.S. Trade Representative overstepped its Section 301 authority under the 1974 Trade Act by imposing retaliatory tariffs against the Chinese and that it violated the Administrative Procedure Act by running tariff rulemakings that lacked transparency. A handful of the complaints make the additional argument that USTR acted unconstitutionally by taxing importers.

Email ITTNews@warren-news.com for a copy of the order.
— **Paul Gluckman**

FDA Begins Using AI for Seafood Import Screening as Second Phase Pilot Begins

FDA recently launched the second phase of its Artificial Intelligence Imported Seafood Pilot program, and will over the next six months apply machine learning technologies in the field as part of its screening processes for seafood imports, the agency said in a [constituent update](#) Feb. 8. FDA says it does not anticipate disruptions to importers from the pilot, which began Feb. 1 and is set to run through July 31.

FDA had announced its intent to move forward with phase two at the end of August (see [ITT 09/01/2020](#)), after it successfully completed a proof of concept on applying machine learning for targeting purposes. During the proof of concept, FDA had applied machine learning to vast amounts of data on past seafood shipments, discovering that use of the technology resulted in a threefold increase in the likelihood of identifying violative shipments.

FDA’s Dan Solis, assistant commissioner-import operations, told members of the National Customs Brokers & Forwarders Association of America that the technology will streamline and expedite the seafood import process as it “risk-ranks” shipments for safety, according to an update emailed Feb. 8 by the trade group. “Rather than looking at multiple databases manually, the AI screening tool analyzes large quantities of data points collected at import and crosschecks it with FDA internal databases, automatically identifying connections and patterns that would otherwise go unnoticed by previous screening techniques,” the NCB-FAA said, citing Solis.

Following completion of the pilot, FDA will once again communicate its findings to the public, FDA said in its con-

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stituent update. “The pilot program will help the agency not only gain valuable experience with new powerful AI-enabled technology but also add to the tools used to determine compliance with regulatory requirements and speed up detection of public health threats,” FDA said. Data from the pilot program “will be studied and used to evaluate the utility of AI in support of import targeting, which may ultimately help implement an AI model to target high-risk seafood products,” FDA said.

FDA Posts More Materials From Public Meetings on Food Traceability Proposal

FDA posted more [materials](#) from recent virtual public meetings on its 2020 proposed rule on traceability requirements for high risk-foods (see [ITT 09/22/2020](#)), the agency said in a Feb. 12 [constituent update](#). The new materials include a “supply chain example” on how data would be kept and shared in a supply chain for a salad kit. FDA already posted video recordings and transcripts of the three meetings it held on its proposed rule, it said. Comments on the proposal are due Feb. 22 (see [ITT 12/17/2020](#)).

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