JAVELIN
GLOBAL COMMODITIES

The Honorable Jamieson Greer
Ambassador
U.S. Trade Representative
600 17th Street NW
Washington, DC 20508

17th March 2025

Dear Ambassador Greer

By way of introduction, I am the CEO of Javelin Global Commodities, a global commodities trading, logistics, operations, and investment group, engaged across multiple commodities sectors, including thermal coal, metallurgical coal, iron ore, oil & gas, metals, steel scrap, and renewables.

Over the last decade, Javelin has established itself as one of the leading commodity traders in the world, delivering over 60 million of tonnes of commodities per year, servicing over 200 clients globally and employing around 200 commodity trading professionals London, New York, San Diego, Saint Louis, Singapore, Krakow, Dubai, Melbourne and Bangalore. The core of Javelin's business is providing logistical and risk management services to U.S. miners and steel mills, supporting industry and jobs by developing access to global markets for US goods. Javelin also owns five coal mining assets in the state of Kentucky, where we employ 430 people in Harlan County.

We refer to USTR Section 301 Investigation of China's Targeting of the Maritime, Logistics and Shipbuilding Sectors. While we are fully supportive of the aims of the investigation, if the proposed fees are enacted as currently proposed, the incremental cost imposed on the supply chain will render US producers materially less competitive in international markets and they will lose market share to competitors from other regions, who are not burdened with such a levy. Commodities such as coal and iron ore are particularly at risk, given the disproportionate cost of the fees relative to the value of the product. The likely consequence is that exports of certain bulk commodities will cease entirely, depressing revenues for US businesses and, in many cases, threatening their financial stability.

The US exported 97.7 million metric tons of coal into the international markets in 2024, of which Javelin exported 24.2 million metric tons, targeting a global customer base for our own mines in Kentucky, and for American Coal Natural Resources Inc (ACNR), and Foresight Coal Sales LLC, who combined shipped 16.9 million mt of coal to export markets. Javelin also exports products from all the major US steel companies and coal companies. We anticipate utilising approximately 191 vessels in 2025 to move similar volumes into the export market and we have a unique insight into the impact of the proposed fees on US exports, some of which are already being seen in our daily business interactions with our clients, customers and vendors.

The global fleet of vessels which carries dry bulk commodities, such as coal and iron ore, from US producers to global consumers is predominantly made up of vessels with a capacity between 55,000 DWT up to 180,000 DWT. That specific global fleet profile is composed of about 48% of Chinese built vessel (0.2% US built) and the new building order book is about

72% from Chinese yards. No ship owner/operator of a Chinese built vessel will commit to call at a US port without the exporter taking on the full liability of the proposed fees. The issue is further exacerbated by the extension of fees to non-Chinese vessels if the relevant operator also owns or has on order Chinese built vessels. The vast majority of non-Chinese shipping operators have an existing fleet with a significant proportion of Chinese built tonnage and, again, no ship owner/operator who owns or has on order Chinese built vessels will commit to call at a US port without the exporter taking on the full liability of the proposed fees.

The reality today is that there is insufficient supply of suitable vessels for US producers to charter which would enable them to avoid paying these fees. If Foresight were to shoulder the burden of the proposed fees in order to secure essential export capacity, we see this liability between $129,000,000 and $135,000,000 over 2025. For ACNR the amount would be between $135,000,000 and $140,000,000. Clearly, these are financial burdens which cannot be absorbed by US producers. As a result, we are unable to secure vessels to export goods into the international market and our clients' revenues are under immediate and severe threat.

Ultimately, production facilities will be forced to close as the international market switches to source more competitive supplies of essential commodities. This will directly impact US jobs and livelihoods in coal and iron ore mining, railroads, steel and coke companies and ports. Many of these jobs are in areas where there is limited opportunity to find alternative employment.

This is a highly complex area with many competing priorities to balance, and careful planning is essential to avoid unintended consequences and lasting harm to US interests. Javelin is available at your convenience to discuss this matter further.

Yours sincerely,

Peter Bradley
Chief Executive Officer
Javelin Global Commodities (UK) Ltd