



September 18, 2025

Ambassador Jamieson L. Greer
United States Trade Representative
Office of the United States Trade Representative
600 17th Street NW
Washington, D.C. 20508

Re: Ensuring Fair Market Access for Oregon Pink Shrimp in the U.K. Market

Dear Ambassador Greer,

The Oregon Trawl Commission (“OTC”),¹ the Shrimp Producers Marketing Cooperative (“SPMC”),² and the Oregon Department of Agriculture (“ODA”) urge the Administration to pursue trade measures that will secure more fair and reliable access to the United Kingdom (“U.K.”) market for U.S. seafood producers, especially harvesters of Oregon pink shrimp.

An essential aspect of the OTC, SPMC, and ODA is to promote the sustainable and economically viable future of Oregon’s seafood industry. To that end, Oregon pink shrimpers strive to supply both domestic and international markets with sustainably produced wild-caught seafood. Oregon coldwater pink shrimp (*Pandalus jordani* under HTS 1605.21; 1605.29) comprise one of the industry’s primary seafood products and is the first shrimp fishery in the world to be certified as sustainable by the Marine Stewardship Council, underscoring the industry’s commitment to responsible fishing practices.³ All three West Coast states of the U.S. that produce *jordani* shrimp – Oregon, Washington, and California – are committed to long term sustainability for the fishery.

¹ The OTC is a fishermen-funded state commodity group established by the Oregon state legislature in 1963. With roughly 100 fishing vessels, OTC represents Oregon trawl fishermen who produce sustainable, wild-caught seafood, including Pacific whiting, Oregon pink shrimp, and various types of groundfish, such as rockfish, sablefish, and sole. Collectively, OTC’s constituents land nearly a quarter of a billion pounds of catch annually, generating approximately US\$60 million in economic value for fishermen alone.

² The Shrimp Producers Marketing Cooperative is an association representing 20 vessels in Oregon that produce *jordani* shrimp for domestic and overseas markets.

³ Oregon Trawl Commission, “Oregon Pink Shrimp,”
<https://www.oregontrawl.org/fisheries/oregon-pink-shrimp>.

The U.K. market is heavily reliant on imports to satisfy consumer demand for seafood, with almost 80 percent of such demand fulfilled by overseas imports.⁴ In addition to this strong demand for seafood generally, coldwater shrimp has long been a popular product consumed in the U.K., thus making it an attractive market for shrimpers.⁵ Historically, the U.K. market has relied more upon coldwater shrimp species that are competitors to *Pandalus jordani* shrimp, namely *Pandalus borealis* and *Pandalus montagui*. These competitor coldwater species are harvested mainly from countries such as Canada, Greenland, and Norway.⁶ However, declining catch volumes, lower harvest quotas, and an increasing vulnerability of the *Pandalus borealis* stock have contributed to more interest in sourcing *Pandalus jordani* shrimp.⁷ Reports of U.K. retailers substituting Oregon pink shrimp for other coldwater shrimp species due to its greater availability, competitive pricing, and sustainability reflect the product's attractiveness in the U.K. market.⁸

Currently, the U.K. maintains certain autonomous tariff quotas ("ATQs") for specific fishery products, which allow such merchandise to enter the market at reduced or eliminated

⁴ Alex Morrison, University of Exeter, "Study Tracks UK's Journey from Seafood Self-sufficiency to Dependence on Imports," Aug. 29, 2025, <https://news.exeter.ac.uk/faculty-of-environment-science-and-economy/study-tracks-uks-journey-from-seafood-self-sufficiency-to-dependence-on-imports/>; Heard *et al.*, "The UK's Expanding Global Reach for Seafood Over 120-years," 35 *Reviews in Fish Biology and Fisheries* at 945 (Apr. 18, 2025), <https://link.springer.com/article/10.1007/s11160-025-09942-x>.

⁵ "What's Happening to the World's Coldwater Prawn Stocks?" (Oct. 17, 2016), <https://academy.pittmanseafoods.com/en/2016/10/whats-happening-to-the-worlds-coldwater-prawn-stocks/>; Chris Loew, "Tariff Hampers U.S. Coldwater Shrimp Sales," (Aug. 8, 2010), <https://www.seafoodsource.com/news/supply-trade/tariff-hampers-u-s-coldwater-shrimp-sales>.

⁶ "Coldwater Shrimp: Catch Has Been Declining for More Than a Decade," (July 1, 2016), <https://eurofish.dk/catch-has-been-declining-for-more-than-a-decade/>; Daphne Sturniolo, "*Pandalus Borealis* Northern Shrimp," https://animaldiversity.org/accounts/Pandalus_borealis/.

⁷ Marta Negrete, "Norway and EU Agreement on Shrimp Quota for the Skagerrak and the North Sea," (June 27, 2025), <https://weareaquaculture.com/news/fisheries/norway-and-eu-agreement-on-shrimp-quota-for-the-skagerrak-and-the-north-sea>; Oliver McBride, "ICES Issues Cautionary Northern Shrimp Advice Amid Data Gaps," (June 11, 2025), <https://thefishingdaily.com/latest-news/ices-issues-cautionary-northern-shrimp-advice-amid-data-gaps/>.

⁸ Neil Ramsden, "US Pink Shrimp Increasingly Replacing Borealis in UK Retail," *Undercurrent News* (June 17, 2015), <https://www.undercurrentnews.com/2015/06/17/us-pink-shrimp-increasingly-replacing-borealis-in-uk-retail/>. *See also* Oregon Fish & Wildlife Marine Resources, "Pink Shrimp Review," (2025), https://www.dfw.state.or.us/mrp/shellfish/commercial/shrimp/docs/36th_APSR_2025.pdf (noting that in 2024, the Oregon pink shrimp fishery experienced its highest catch volume since 2015).

duty rates for further processing.⁹ In 2022, the U.K.’s ATQs for coldwater shrimp of both the *Pandalus borealis* and *Pandalus montagui* species were temporarily increased to meet rising demand, which further demonstrates the popularity of coldwater shrimp among U.K. consumers and the commercial opportunity potentially available to U.S. shrimpers.¹⁰ However, none of the ATQs apply to *Pandalus jordani*, which remains subject to the 20 percent Most Favored Nation (“MFN”) tariff currently applied to all U.S.-origin cooked and peeled shrimp and prawn. The U.K. has long maintained this steep MFN tariff on U.S. pink shrimp, effectively squeezing domestic pink shrimp producers out of the U.K. market.¹¹

In 2024, the ODA sought a tariff suspension for *Pandalus jordani*, in single frozen cooked and peeled form, and certain other seafood products. The effort was supported by U.K. seafood importers. The application for tariff suspension was accepted and moved through a public process. However, in early 2025, the application was denied possibly due to the anticipated trade talks with the U.S. The U.K.’s decision to maintain the steep 20 percent tariff on *jordani* shrimp remains a significant barrier to Oregon shrimpers’ ability to supply the U.K. market.

The OTC, SPMC, and ODA urge the Administration to reach a trade agreement with the U.K. that will eliminate the 20 percent MFN tariff currently applied to U.S.-origin cooked and peeled shrimp and prawn, including the coldwater species *Pandalus jordani*.¹² The U.K.’s 20 percent tariff sharply contrasts with the low tariff rates enjoyed by U.K. seafood producers when exporting to the U.S. market. As previously noted by the OTC, the disparities in tariffs between the U.S. and the U.K. for the same seafood products directly hurts American fishermen.¹³ It is therefore necessary for the Administration to address the harm caused by this unfair trade practice by eliminating the current tariff imposed by the U.K. on U.S. coldwater pink shrimp. Doing so provides further opportunities for domestic, sustainably harvested seafood to compete on a level international playing field.

⁹ British Frozen Food Federation, “Review of Fish and Shellfish ATQ Utilisation,” at p.5 (June 2025), <https://bfff.co.uk/wp-content/uploads/2025/06/ATQ-Uptake-seafood-review-V3.pdf> (noting the five ATQs in place for certain fish and shellfish species).

¹⁰ John Evans, “UK Coldwater Shrimp Quota ‘Likely to Run Out Before Summer Ends’ Threatening Buyers,” *Intrafish* (July 11, 2022), <https://www.intrafish.com/processing/uk-coldwater-shrimp-quota-likely-to-run-out-before-summer-ends-threatening-buyers/2-1-1254541>.

¹¹ Elizabeth Castillo, “How Tariffs Are Affecting Oregon’s Seafood Industry,” Oregon Public Broadcasting (May 20, 2025), <https://www.opb.org/article/2025/05/20/how-tariffs-are-affecting-oregons-seafood-industry/>.

¹² CUSTOMS Info, “Global Tariff Information,” <https://export.customsinfo.com/GlobalTariffs/Default.aspx#> (last accessed Aug. 4, 2025).

¹³ Letter from OTC to Office of the United States Trade Representative, “Request for Comments to Assist in Reviewing and Identifying Unfair Trade Practices and Initiating All Necessary Actions to Investigate Harm From Non-Reciprocal Trade Arrangements (Docket ID: USTR-2025-0001): Comments of the Oregon Trawl Commission (Addendum),” at 2 (Mar. 11, 2025), <https://comments.ustr.gov/s/commentdetails?rid=97P49T4CJT>.

In the absence of an agreement to eliminate the 20 percent tariff, the Administration should pursue the creation of an ATQ for exports of *Pandalus jordani* to the U.K. As described above, Oregon pink shrimp is not covered by an existing U.K. ATQ. Thus, the Oregon pink shrimp industry still lacks adequate, consistent, and fair access to the U.K. market.¹⁴ The implementation of an ATQ for shrimp of the *Pandalus jordani* species can greatly assist U.S. seafood producers in accessing a portion of the U.K. market without facing prohibitive costs. Such an ATQ can also assist the British seafood industry. Since imports under ATQs must be for processing and not for direct consumption, an ATQ for *jordani* shrimp – similar to the ATQs in place for the *borealis* and *montagui* species – provides British processors with greater choice in deciding where to source their coldwater shrimp and guarantees supply to meet consumer demand.¹⁵ In sum, an ATQ for *jordani* shrimp can benefit both the U.S. and British seafood industries, although a direct elimination of the 20 percent tariff remains the most effective measure to ensure fair trade.

The OTC, SPMC, and ODA deeply appreciate the resources invested by this Administration in ensuring fair and meaningful access to key export markets for the U.S. seafood industry. Achieving commercially meaningful market access for U.S. seafood producers with respect to the U.K. will undoubtedly enhance the domestic seafood industry's economic strength and stability.

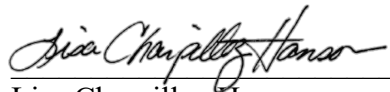
Sincerely,



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¹⁴ John Evans, “U.K. Coldwater Shrimp Quota ‘Likely to Run Out Before Summer Ends’ Threatening Buyers,” *Intrafish* (July 11, 2022), <https://www.intrafish.com/processing/U.K.-coldwater-shrimp-quota-likely-to-run-out-before-summer-ends-threatening-buyers/2-1-1254541>. See also British Frozen Food Federation, “Review of Fish and Shellfish ATQ Utilisation,” at p.5 (June 2025), <https://bfff.co.U.K./wp-content/uploads/2025/06/ATQ-Uptake-seafood-review-V3.pdf> (noting the five ATQs in place for certain fish and shellfish species).

¹⁵ Council of the European Union, “Import of Fishery Products: Council Adopts Autonomous EU Tariff Quotas for 2024 to 2026,” (Nov. 27, 2023), <https://www.consilium.europa.eu/en/press/press-releases/2023/11/27/import-of-fishery-products-council-adopts-autonomous-eu-tariff-quotas-for-2024-to-2026/>.



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