

United States Senate

September 11, 2025

The Honorable Howard W. Lutnick
Secretary
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, D.C. 20230

The Honorable Marco Rubio
Secretary
U.S. Department of State
2100 C Street NW
Washington, D.C. 2052

Dear Secretary Lutnick and Secretary Rubio:

We are grateful for the leadership you and President Trump have shown in advancing policies that restore America's shipbuilding industry and support high quality and high wage jobs, while revitalizing communities across our nation. We were glad to see you and several members of the administration make clear that President Trump will not accept any international environmental agreement that places an unfair burden on the American people ahead of the potential final adoption of this proposal at the IMO Marine Environment Protection Committee (MEPC) session this October.

We share your concerns over the International Maritime Organization's (IMO) advancement of a global carbon-pricing framework and the broader implications it poses for U.S. economic competitiveness, trade policy, and national security.

The current proposal presents a direct threat to American interests. The proposed framework would impose a binding, escalating global carbon tax on maritime shipping through a system of increasingly strict emissions tiers and rising levies. Unlike the Paris Accord, the United States cannot opt out or decline to participate. Even if the U.S. chooses not to implement the tax domestically, it will be enforced by foreign ports of origin, destination and flag states. As a result, American exporters and importers will be required to pay the tax regardless of U.S. policy decisions.

This tax falls disproportionately on the United States. Although we represent only about 11% percent of global trade by value, we are projected to contribute roughly 20% percent of total global IMO tax revenue. This disparity exists because our trade routes span far greater distances than those of other regions such as Europe or Asia. According to industry modeling of the proposed rate structure, American producers and consumers are expected to bear nearly \$1 trillion dollars in tax burden between 2028 and 2035.

Despite this enormous financial impact, the United States has virtually no influence over the policy and will receive none of the tax revenue in return. This is taxation without representation and a direct threat to the United States' economic security.

Every nation supporting this framework stands to benefit, while America does not. As you rightly pointed out, China is using the IMO process to force the premature retirement of vessels and further entrench its targeted dominance in the shipbuilding industry. Major container shipping lines from Europe, Japan, and China collectively control the majority of the world's total container capacity. These foreign global carriers operate in nearly every trade lane and have embraced the regulatory burden as a profit center, aligning their fleet investments with the IMO Framework to gain a competitive advantage over American operators. This is simply a wealth redistribution plan that provides no meaningful environmental benefit.

Applying this framework globally instead of regionally also risks creating significant economic distortions, such as unintentionally shifting cargo from maritime transport modes such as U.S. short-sea shipping, which is already a cleaner alternative to land-based options that remain exempt from carbon taxation.

The administration has made clear that President Trump rejects this proposal and will not tolerate any action that harms Americans and increases costs on our citizens and businesses. To protect American economic and maritime interests, we ask that the administration immediately apply trade leverage to block the IMO framework. As many of the countries supporting this tax are currently engaged in critical trade negotiations with the United States, timing is critical and this requires immediate action.

This is a historic opportunity not only to stop the IMO carbon tax, but to restore our influence in global maritime policy and rapidly reassert American global maritime dominance. The stakes for American workers, our industries, and our national security could not be higher, and we are committed to working together to protect American interests, defend our economic sovereignty, and strengthen the future of U.S. maritime power.

Sincerely,



Rick Scott
United States Senator



Ashley Moody
United States Senator